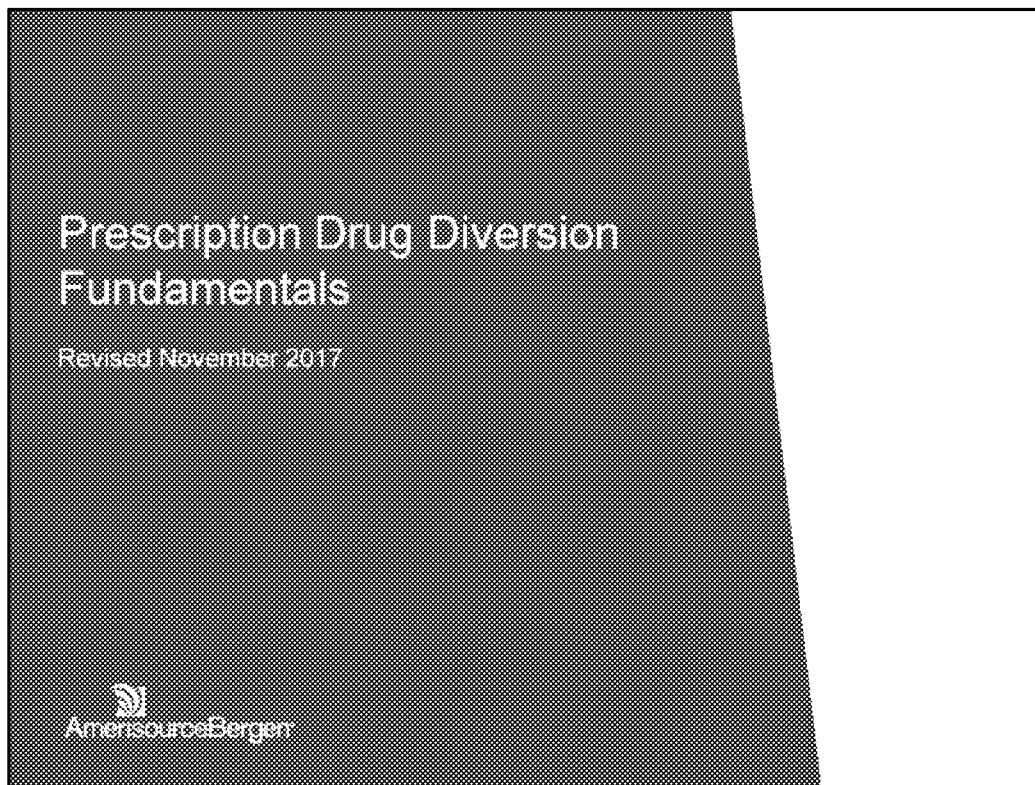


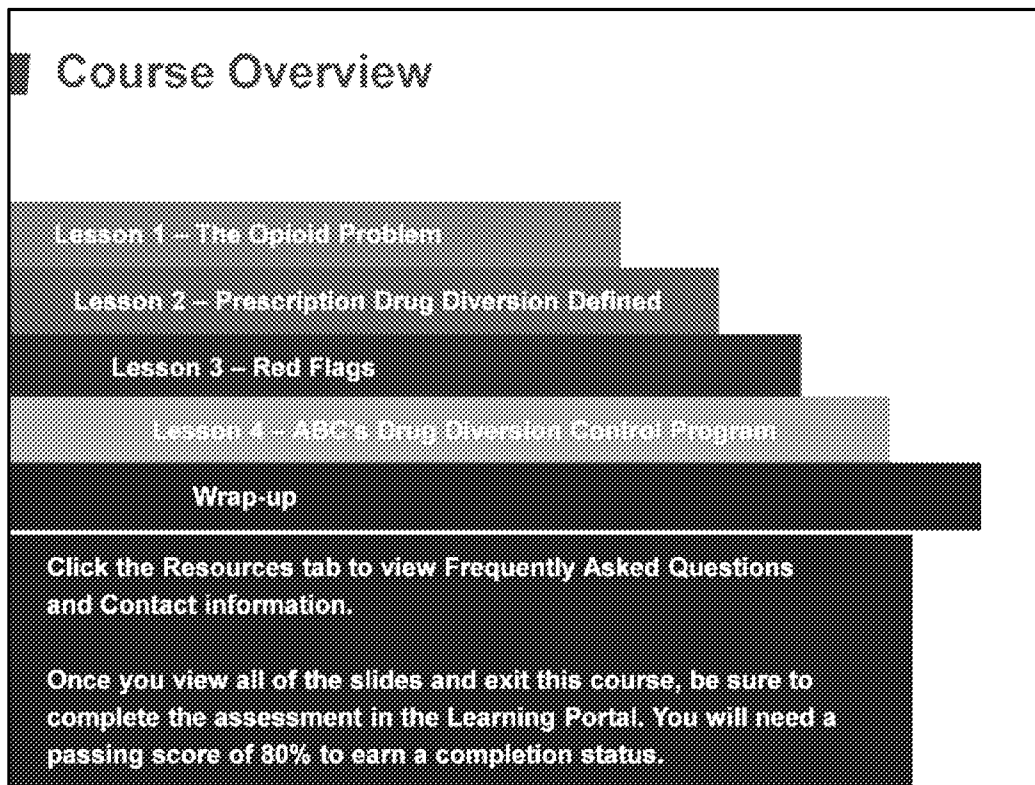
EXHIBIT 39



Time: 15 seconds

Narration:

Welcome to the Prescription Drug Diversion Fundamentals e-learning course. This course was updated in November 2017 and includes the most updated statistics available at the time. Please note that all previous versions of this course are obsolete.



(Prod Note: animate bars in 1 at a time)

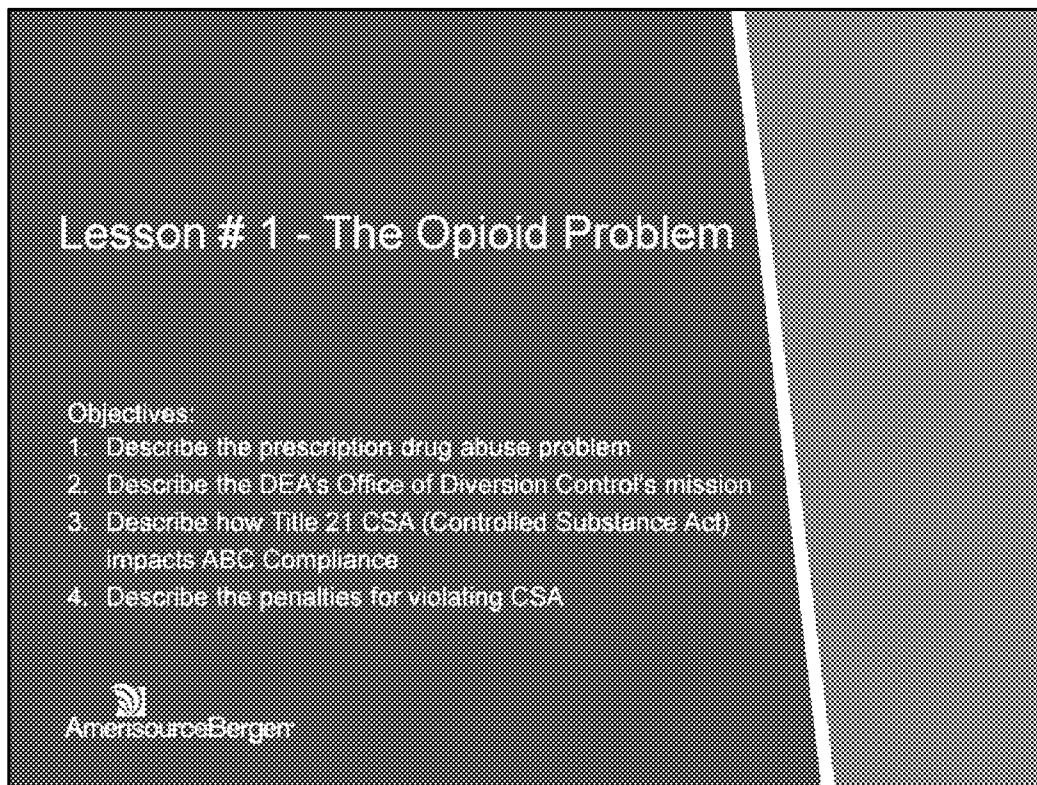
Time: 35 seconds

Narration:

Click the Resources tab to view Frequently Asked Questions and Contact information. Once you view all of the slides and exit this course, be sure to complete the assessment in the Learning Portal. You will need a passing score of 80% to earn a completion status.

This course has 4 lessons. We'll begin by talking about the opioid problem in the United States. Next, we'll define prescription drug diversion. Then, we'll identify common red flags about prescription drug diversion associated with retail pharmacies. We'll take a deep dive into the drug diversion control program at AmerisourceBergen (ABC). In the final section, we'll wrap up the course, provide additional resources and discuss expectations to make an impact.

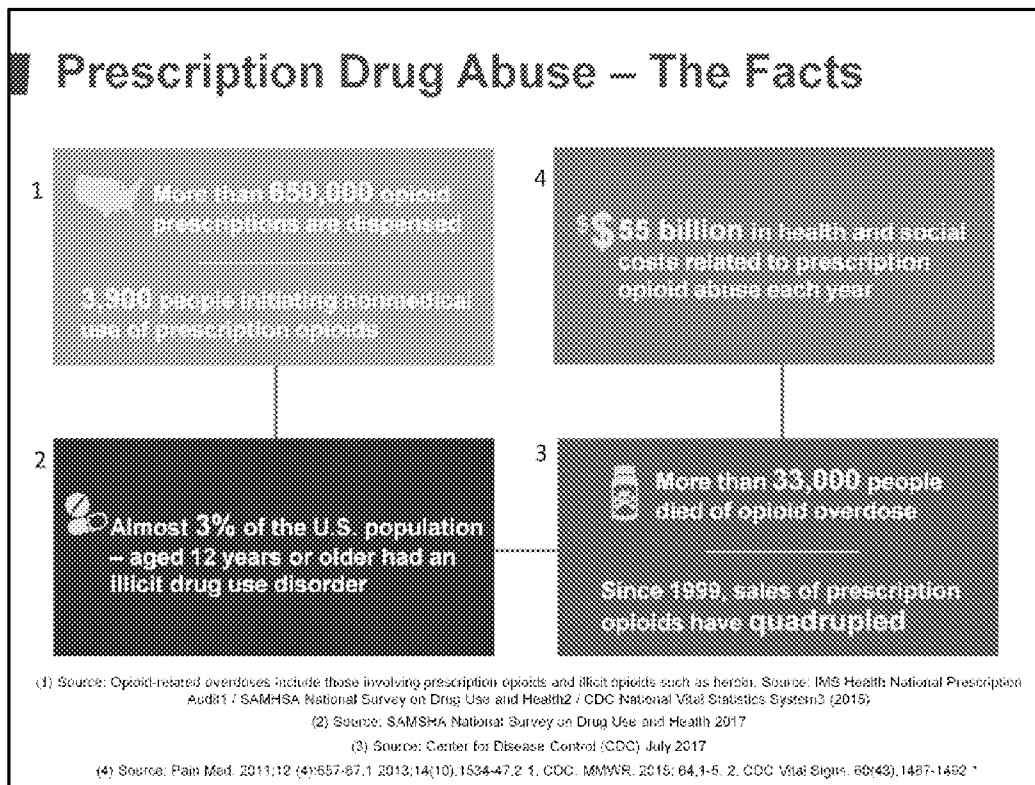
Now that you know what this course is about, let's take a closer look at the opioid problem in America.



Time: 28 seconds

Narration:

In understanding the opioid problem, we'll look at statistics that clearly demonstrate the severity of this issue within the U.S. We'll then familiarize ourselves with the DEA's Office of Diversion Control's mission to mitigate this problem. We'll learn about controls and procedures to guard against theft and diversion of controlled substances under Title 21 of the Controlled Substance Act. We'll also gain an understanding of the penalties for violating this act.



(Production note: each box animates / wipes in with associated audio and source information at the bottom, 1 at a time)

Time: 1 minute, 38 seconds

Narration: On an average day in the United States, more than 650,000 opioid prescriptions are dispensed with 3,900 people initiating nonmedical use of prescription opioids.

The National Survey on Drug Use and Health found that some 7.4 million people — almost 3% of the U.S. population — aged 12 years or older had an illicit drug use disorder. The most commonly misused medications were hydrocodone products, with almost 7 million of the 11.5 million naming brands such as *Vicodin* and *Lortab*. Oxycodone was misused by almost 4 million Americans.

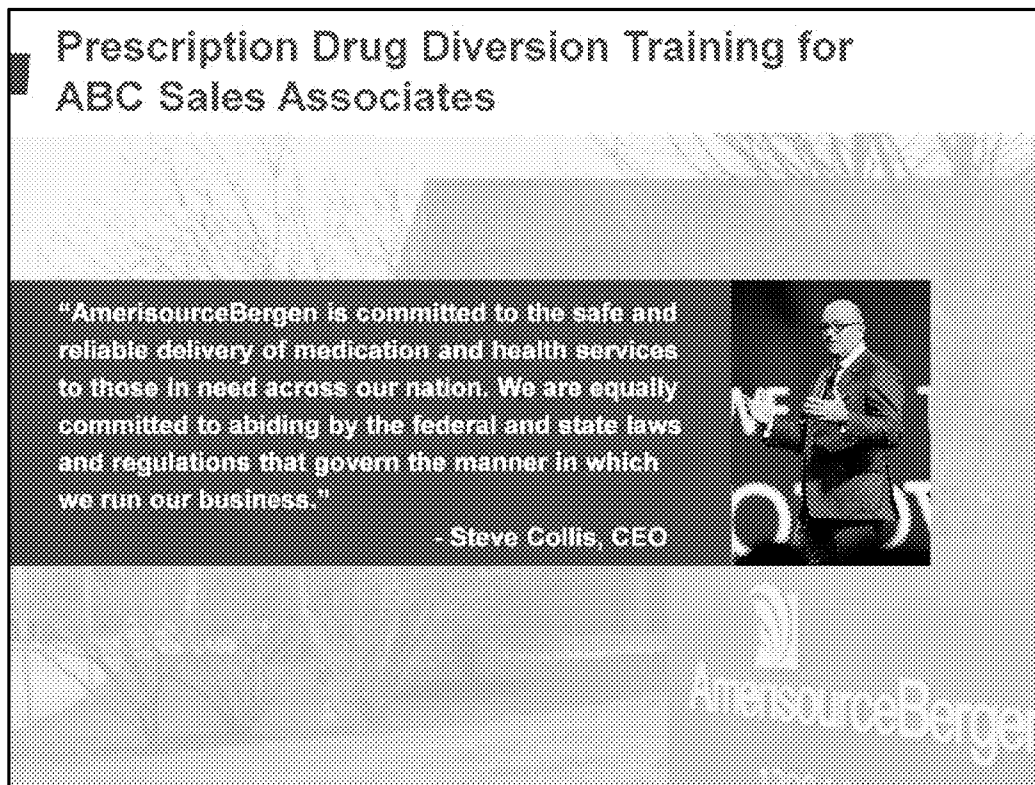
In 2015, more than 33,000 people died of opioid overdose, with another 20,000 dying from other drugs. A recent federal study found that prescription painkillers are now more widely used than tobacco. Since 1999, sales of prescription opioids have quadrupled.

The economic impact of the opioid epidemic include: \$55 billion spent in health and social costs related to prescription opioid abuse each year. \$20 billion spent

in emergency department and inpatient care for opioid poisonings.

As you can see, the statistics overwhelmingly demonstrate that we have an opioid epidemic in the U.S., and tragically people are dying. Any discussion about drug diversion must begin with a current understanding of the tremendous prescription drug abuse problem we face as a nation.

We have a moral obligation to reduce the severity of this issue. And, at AmerisourceBergen, our duty extends beyond the moral obligation.



Time: 15 seconds

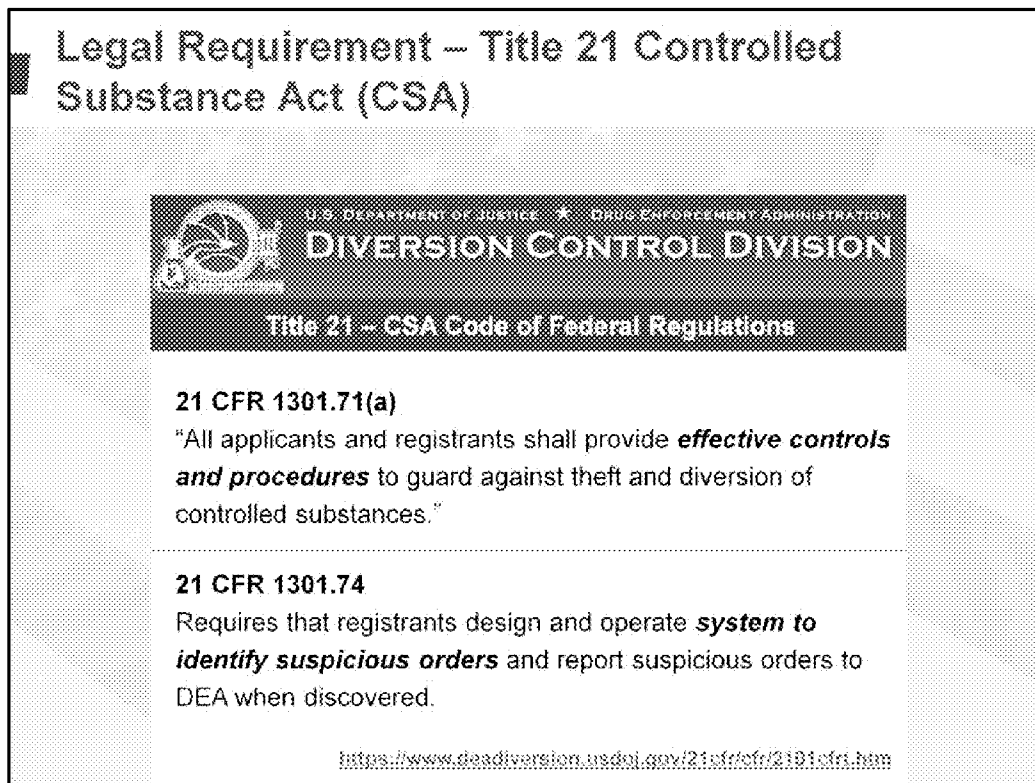
Narration: Our CEO Steve Collis stresses our commitment to safe and reliable delivery of medication and health services across our nation. It's critical that our operations remain in compliance with federal and state laws and regulations.



Time: 12 seconds

Narration: To help address our nation's drug abuse problem, the DEA's Office of Diversion Control was established with the mission to prevent, detect, and investigate the diversion of controlled pharmaceuticals.

(Prod Note: Hyperlink:
<https://www.deaiversion.usdoj.gov/21cfr/cfr/2101cfrt.htm>)



(Prod note): animate text in as audio plays. Hyperlink:
<https://www.deadiversion.usdoj.gov/21cfr/cfr/2101cfr.htm>
Time: 45 seconds

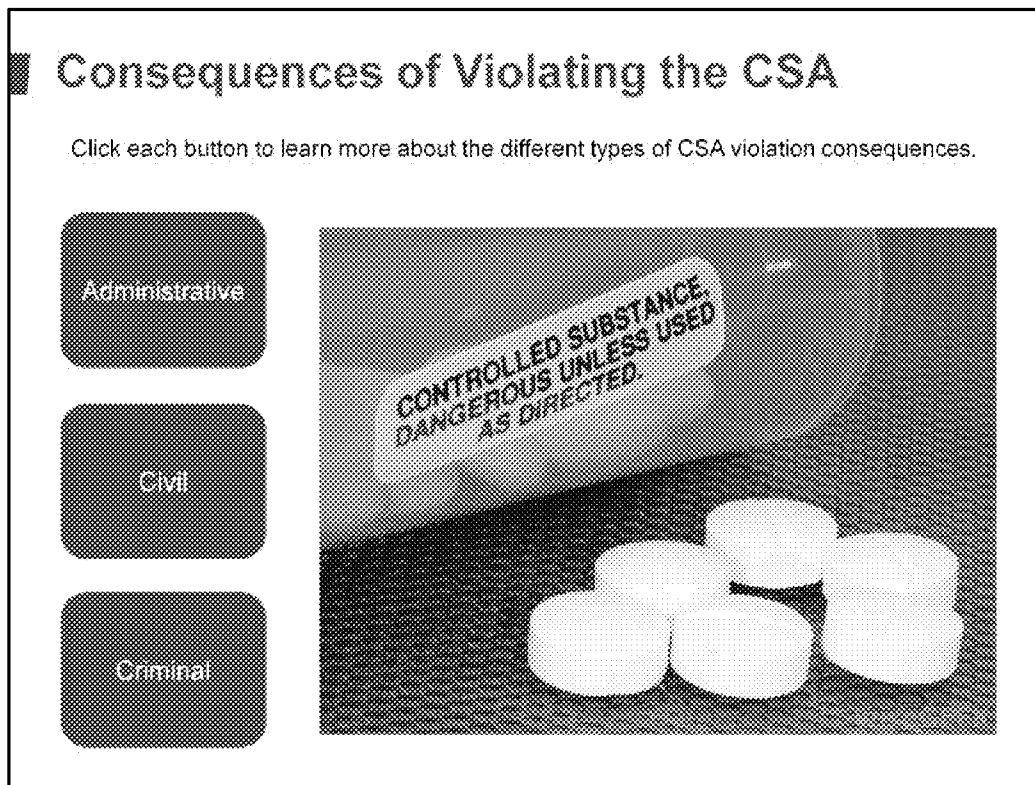
Narration:

AmerisourceBergen, as a wholesale drug distributor, is a DEA registrant and is legally bound by Federal law, specifically Title 21 of the Controlled Substance Act (CSA) and implementing regulations.

In part, the act requires that we must have effective controls and procedures to guard against theft and diversion of controlled substances, and a system to identify suspicious orders of controlled substances by our customers.

For us, that system is the Order Monitoring Program, or OMP, which is the cornerstone of the company's diversion control program. We'll dive into more details of the OMP in Lesson 4.

What would happen if AmerisourceBergen was not in compliance with the CSA?



(Prod note: Interaction: 3 button reveal (Administrative, Civil and Criminal buttons. No button selected yet). See next 3 screens for more details.

Time: 25 seconds

Narration:

All registrants, including AmerisourceBergen, operate in a highly regulated and “closed system”. We’ll talk more about closed systems in Lesson 2. As such, we are subject to the full range of Administrative, Civil and Criminal Actions for violation of the CSA and implementing regulations.

Click each button to learn more about the different types of CSA violation consequences.

Consequences of Violating the CSA

Click each button to learn more about the different types of CSA violation consequences.


Administrative

Civil

Criminal

Administrative:

- Order to show cause
- Immediate suspension order



[It happened to ABC! Read the News Release](#)

(Prod note: Interaction: 3 button content reveal (Administrative, Civil and Criminal buttons; Administrative button selected

Hyperlink:

<http://www.amerisourcebergen.com/investor/phoenix.zhtml?c=61181&p=irol-newsArticle&ID=1044998>)

Time: 11 seconds

Narration: Administrative penalties for violating the CSA include: order to show causes or immediate suspension. It happened to us in the past! We need to eliminate the likelihood of this happening again. Click the link to read the news release.

Consequences of Violating the CSA

Click each button to learn more about the different types of CSA violation consequences.


Administrative

Civil

Criminal

Civil:

- Fines: a \$10,000 per violation fine for each occurrence of drug diversion
- McKesson ordered to pay \$150 million in fines and to suspend sales of controlled substances



(Prod note: 3 button content reveal (Administrative, Civil and Criminal buttons; Civil button selected)

Time: 3 seconds

Narration: Civil penalties for violating the CSA include a \$10,000 per violation fine for each occurrence of drug diversion. Our competitor, McKesson was ordered to pay \$150 million in fines and to suspend sales of controlled substances from four distribution centers as a result of an opioid settlement.

Consequences of Violating the CSA

Click each button to learn more about the different types of CSA violation consequences.


Administrative

Civil

Criminal

Criminal:

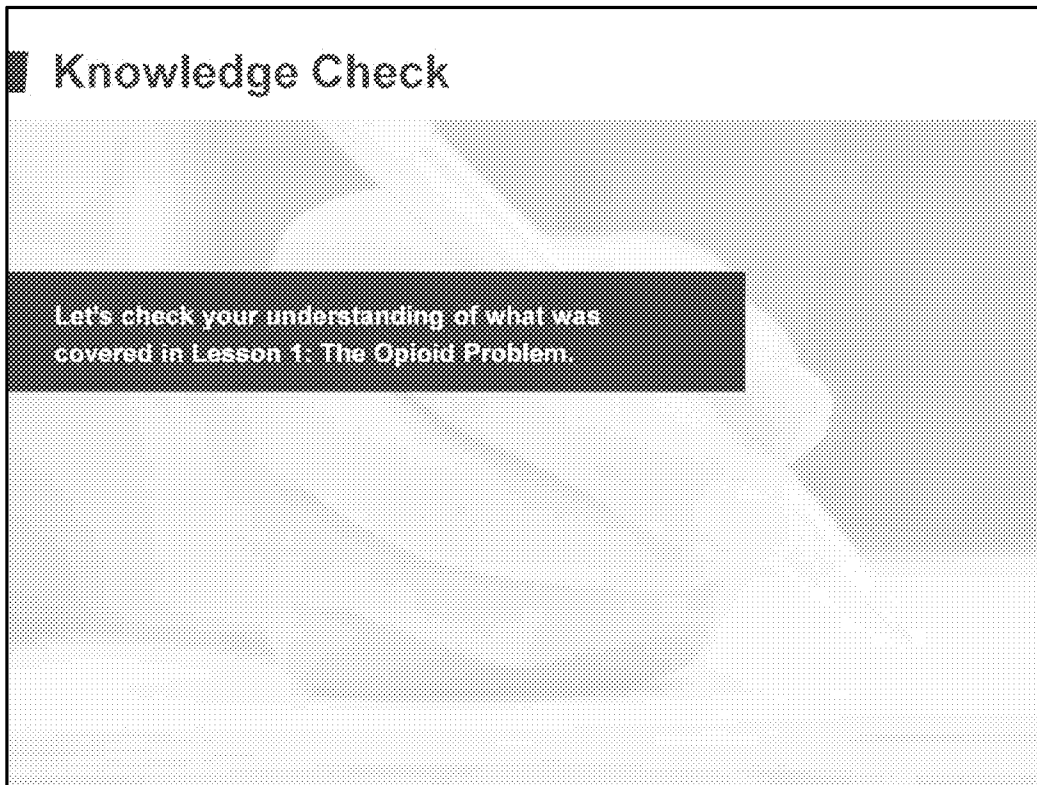
- Investigation that results in criminal prosecution of the organization and/or its members



(Prod note: 3 button content reveal (Administrative, Civil and Criminal buttons; Criminal button selected))

Time: 6 seconds

Narration: Criminal penalties for violating the CSA may include prosecution of the organization and/or any of its members.



Time: 5 seconds

Narration: Let's check your understanding of what we covered in Lesson 1: The Opioid Problem.

■ What percentage of the U.S. population — aged 12 years or older had an illicit drug use disorder?

A. 1%

B. 3%

C. 4%

D. 5%

Source: SAMSHA National Survey on Drug Use and Health 2017.

Time: 10 seconds

What is the mission of the DEA's Office of Diversion Control?

A. To prevent, detect, and investigate the diversion of controlled pharmaceuticals and listed chemicals

B. To support, control, and block the diversion of controlled pharmaceuticals and listed chemicals

C. To risk, enforce, and punish the diversion of controlled pharmaceuticals and listed chemicals

D. To encourage, promote, and allow the diversion of controlled pharmaceuticals and listed chemicals

Time: 10 seconds

Violation of Title 21 of the Controlled Substance Act (CSA) or any of its implementing regulations by a DEA registrant may result in which of the following?

- A. Administrative Action, including suspension of registration
- B. Civil Fines
- C. Criminal Prosecution
- D. All of the above

Time: 10 seconds

True or False? AmerisourceBergen, a wholesale drug distributor, is a DEA registrant and is legally bound by Federal law, specifically Title 21 of the Controlled Substance Act (CSA) and its implementing regulations.

A. True
B. False

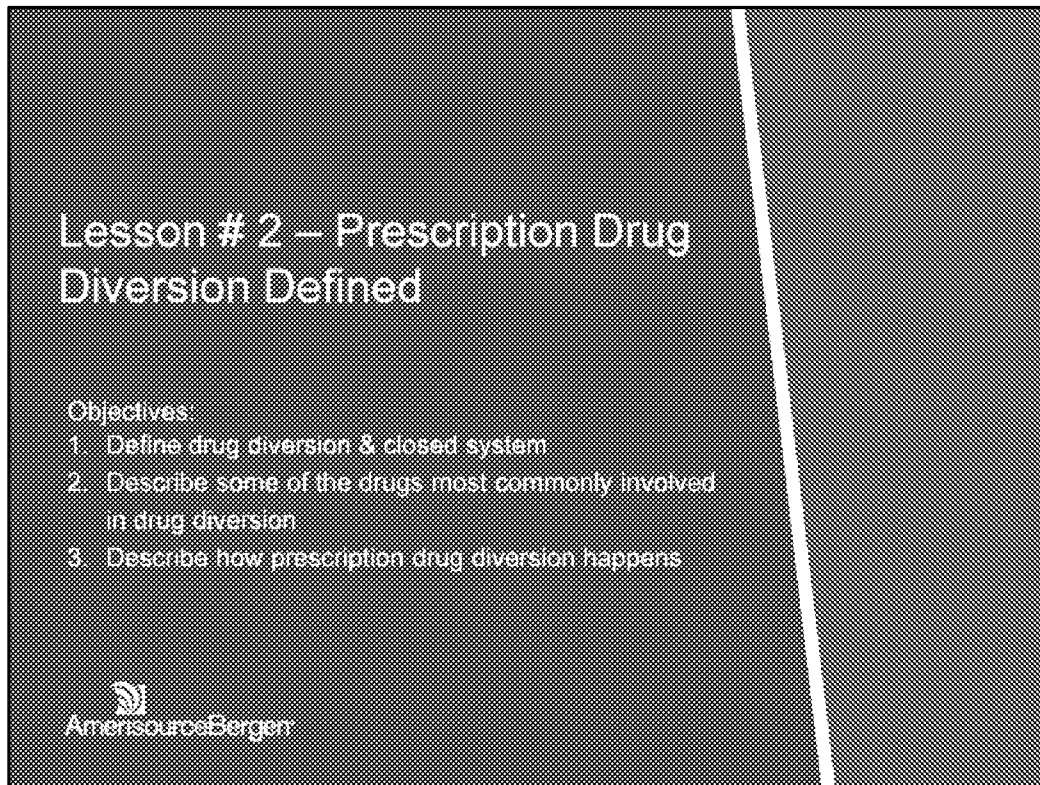
Time: 10 seconds

■ Summary – Lesson 1: The Opioid Problem

- The United States has an opioid problem
 - On an average day in the U.S., more than 650,000 opioid prescriptions are dispensed with 3,900 people initiating nonmedical use of prescription opioids
 - Almost 3% of the U.S. population — aged 12 years or older had an illicit drug use disorder
 - In 2015, more than 33,000 people died of opioid overdose
- The mission of the DEA's Office of Diversion Control is to prevent, detect, and investigate the diversion of controlled pharmaceuticals and listed chemicals
- Title 21 –Controlled Substance Act (CSA), which AmerisourceBergen must follow, requires us to have effective controls and procedures in place to prevent diversion and requires systems to identify suspicious orders
- Consequences for violating the CSA include administrative, civil, and criminal penalties

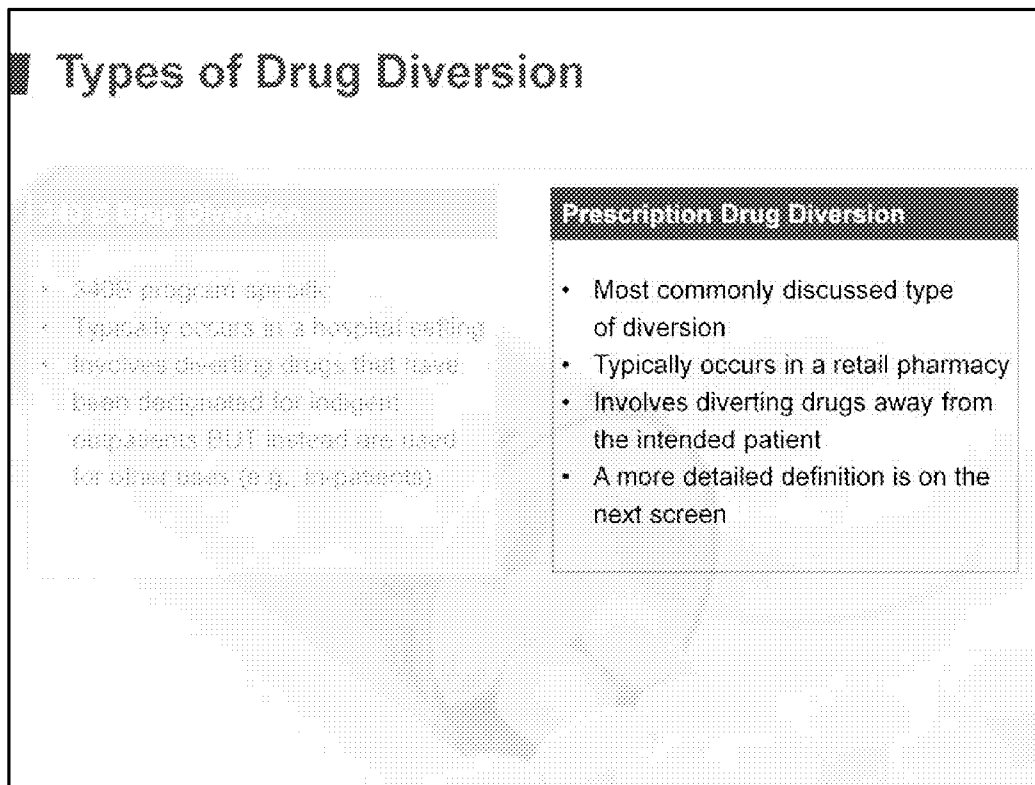
Time: 11 seconds

Narration: This concludes Lesson 1: The Opioid Problem. Read over the summary items. Once you are finished, click Next to move on to Lesson 2 – Prescription Drug Diversion Defined.



Time: 11 seconds

Narration: In Lesson 2, we'll define prescription drug diversion and where this can occur in the distribution process. We'll describe the most commonly diverted prescription drugs and explore different ways drug diversion can happen.



(Prod note: fade 340B out when mentioning not covered)

Time: 34 seconds

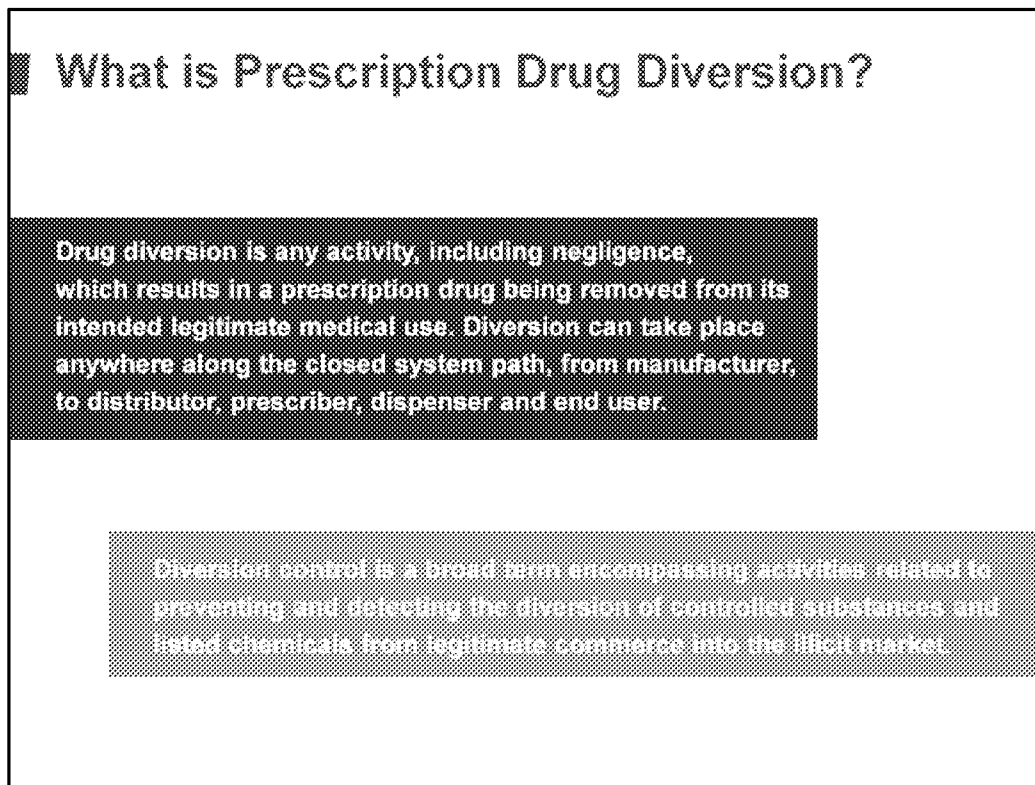
Narration:

There are at least two types of drug diversion commonly discussed, including 340B drug diversion and prescription drug diversion.

The 340B program was developed to provide discounted or free drugs to help healthcare facilities support indigent patients. This training does not cover 340B drug diversion. See ABC's learning portal for training on the 340B program and 340B drug diversion.

This course will focus on prescription drug diversion. Let's move on to learn more about prescription drug diversion.

(Prod note: fade 340B out when mentioning not covered)



(Prod note: Boxes wipe in 1 at a time, synched to audio)

Time: 29 seconds

Narration:

Drug diversion is any activity, including negligence, which results in a prescription drug being removed from its intended legitimate medical use. Diversion can take place anywhere along the closed system path, from manufacturer, to distributor, prescriber, dispenser and end user.


Diversion control encompasses activities related to preventing and detecting the diversion of controlled substances and listed chemicals from legitimate commerce into the illicit market.

■ What is Prescription Drug Diversion?

Click each button to learn more about a **closed system** and **diversion of listed chemicals**.

Closed System

Diversion of Listed Chemicals



(Prod Note: **Interaction:** 2 button reveal (Closed System and Listed Chemical buttons); combined with slides 22 and 23

Time: 5 seconds

Narration:

Click each button to learn more about a closed system and diversion of listed chemicals.

■ What is Prescription Drug Diversion?

Click each button to learn more about a **closed system** and **diversion of listed chemicals**.

Closed System

Under the framework of the CSA, the DEA is responsible for ensuring that all controlled substance transactions take place within the "closed system" of distribution established by Congress. Under this "closed system," all legitimate handlers of controlled substances – manufacturers, distributors, physicians, pharmacies, and researchers – must be registered with the DEA and maintain strict accounting for all distributions.

Source: DEA's website
<https://www.dea/diversion.html>

Diversion of Listed Chemicals

(Prod Note: **Interaction:** 2 button reveal (Closed System button clicked) combined with slides 21 and 23

Time: 16 seconds

Narration:

Under a closed system, all legitimate handlers of controlled substances – manufacturers, distributors, physicians, pharmacies, and researchers – must be registered with the DEA and maintain strict accounting for all distributions.

What is Prescription Drug Diversion?

Click each button to learn more about a **closed system** and **diversion of listed chemicals**.

Closed System

Diversion of Listed Chemicals

Diversion of Listed Chemicals

"In addition to other drugs of abuse, today's illicit drug market offers an assortment of purely synthetic drugs that are abused by both young and old alike. These drugs are often illegally manufactured or synthesized in clandestine laboratories that require chemicals to synthesize, extract, and purify these drugs. Frequently, these clandestine laboratories pose significant public health and safety issues. Therefore, the DEA has long recognized the need to monitor and control these chemicals."

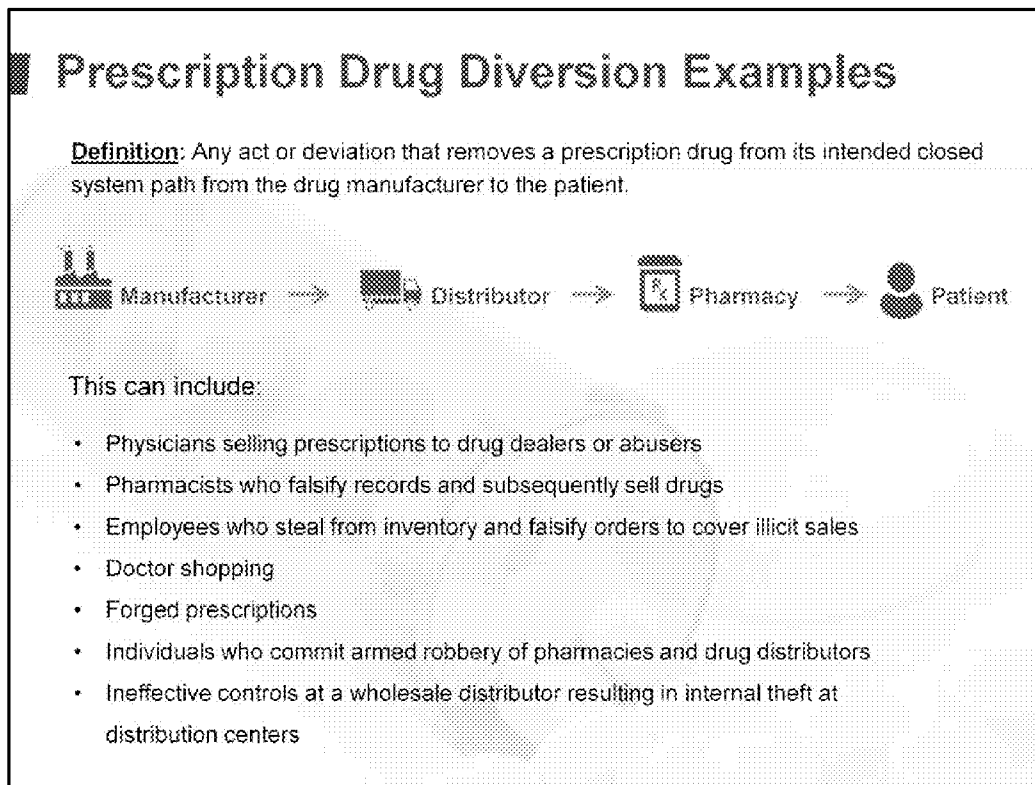
Source: DEA's website
https://www.deadiversion.org/dil/awards_desc/index.htm

(Prod Note: **Interaction:** 2 button reveal (Closed System and Listed Chemical buttons; Listed Chemicals button selected); combined with slides 21 and 22)

Time: 26 seconds

Narration:

Today's illicit drug market offers an assortment of purely synthetic drugs that may be abused including methamphetamine. Often, these drugs are illegally manufactured in clandestine laboratories that require chemicals to synthesize, extract, and purify these drugs. Frequently, these laboratories pose significant public health and safety issues. Therefore, the DEA has long recognized the need to monitor and control these chemicals.



(Prod note: animate bulleted list in with audio)

Time: 48 seconds

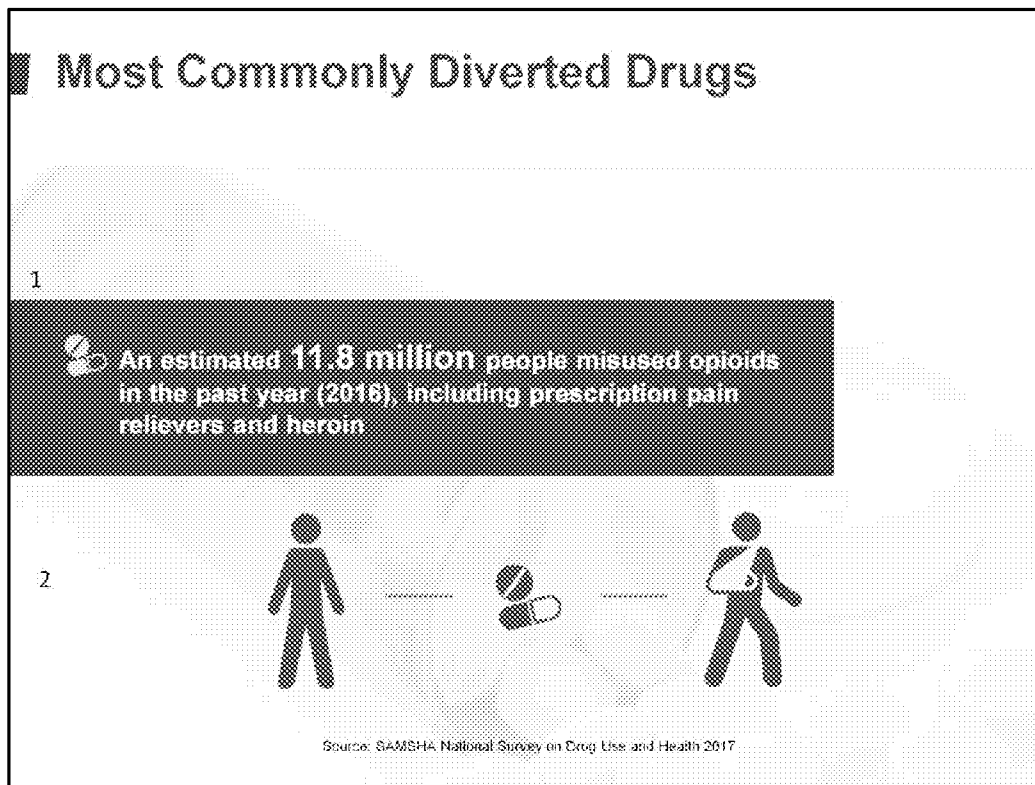
Narration:

As discussed, drug diversion can take place anywhere along the closed system path, from manufacturer, to distributor, pharmacy, and patient.

Prescription drug diversion can include:

- Physicians selling prescriptions to drug dealers or abusers
- Pharmacists who falsify records and subsequently sell drugs
- Employees who steal from inventory and falsify orders to cover illicit sales
- Doctor shopping
- Forged prescriptions
- Individuals who commit armed robbery of pharmacies and drug distributors
- Ineffective controls at a wholesale distributor resulting in internal theft at distribution centers

Drug diversion is dangerous. Certain types of drugs are more likely to be diverted because of misuse.



(Prod note: fade out statistics (1) and have (2) person icon with pills and then injury icon lines to each, and have slide 26 images and labels fade in with audio)







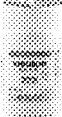



Time: 31 seconds

Narration:

One of the biggest threats for drug diversion are opioids or painkillers. An estimated 11.8 million people misused opioids in 2016, including prescription pain relievers and heroin. Unfortunately, these drugs have very addictive qualities. Imagine someone who was prescribed hydrocodone following an injury. They may become reliant on the medication and continue to use the drug long after the legitimate medical need has passed. This is just one example of how drug diversion can take place.

■ Most Commonly Diverted Drugs

Misuse of painkillers represents 60-75%* of the overall problem of prescription drug abuse:

				
Hydrocodone combo	Carisoprodol	Promethazine with Codeine syrup	Oxymorphone	Methadone
				
Fentanyl	Alprazolam 2mg	Oxycodone (15mg & 30 mg)	Adderall	Hydromorphone

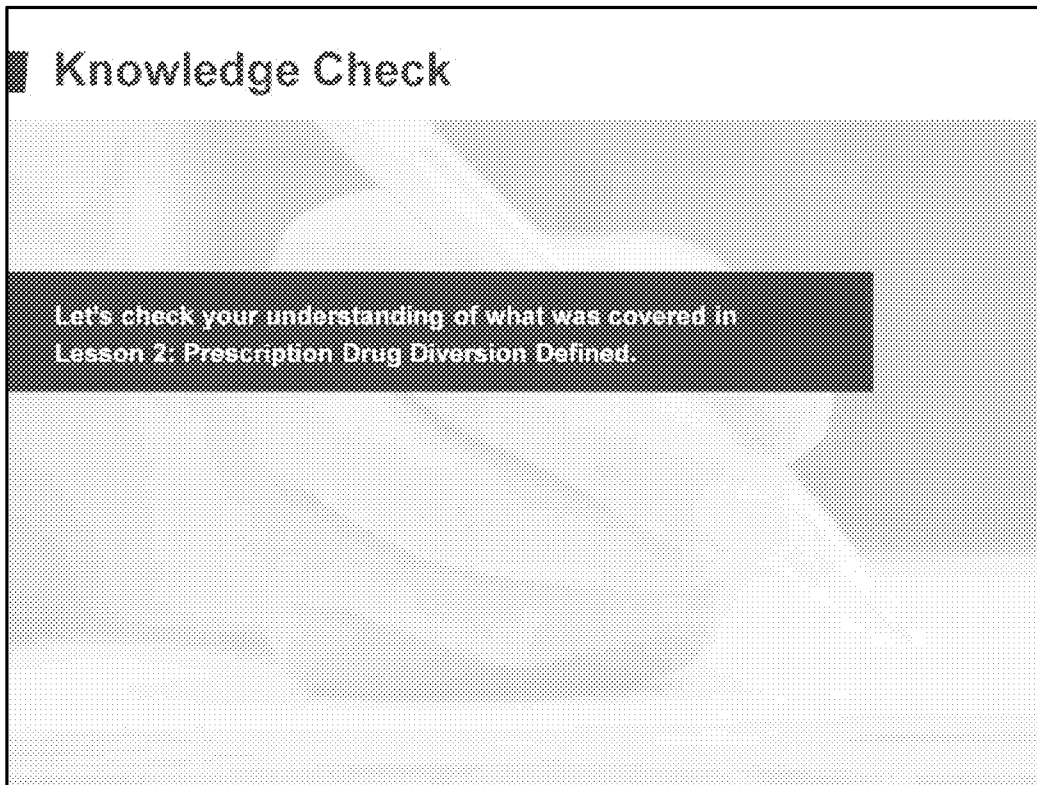
*Percentage varies on different studies

(Prod note: This slide to be combined with 25: / images and text fades in after slide 25's text and graphics)

Time: 18 seconds

Narration:

Misuse of painkillers represents 60-75% of the overall problem of prescription drug abuse. Hydrocodone, Carisoprodol, Promethazine with codeine syrup, and Oxymorphone are some of the most commonly diverted drugs. Familiarize yourself with these.



Time: 6 seconds

Narration: Let's check your understanding of what we covered in Lesson 2: Prescription Drug Diversion Defined.

■ **What does prescription drug diversion mean?**

- A. Drug diversion is any activity, including negligence, which results in a prescription drug being removed from its intended legitimate medical use.
- B. During a drug shortage, re-allocating drugs from one pharmacy to a another who's willing to pay more
- C. Changing the type of drug distribution from one form of delivery to another (e.g., truck shipment to air delivery)

Time: 10 seconds

In the context of prescription drug diversion, what does “closed system” mean?

A. A drug distribution system that will not accept any additional controlled substances entries because of throughput restrictions (e.g., time to get drugs to patients is too long)

B. A drug distribution system that has been shut down by the DEA due to a severe CSA violation

C. A drug distribution system that only allows FDA-approved pharmaceuticals be distributed

D. A drug distribution system whereby any handlers of controlled substances are registered with the DEA and maintains strict accounting for all distributions

Time: 10 seconds

Which of the following would constitute a form of prescription drug diversion? Select all that apply.

- ☐ A. Theft of controlled substances
- ☐ B. Physicians selling drugs to drug dealers or abusers
- ☐ C. Filling an otherwise valid prescription on Sundays
- ☐ D. Forged prescriptions
- ☐ E. Doctor shopping

Time: 10 seconds

Which one of the following categories of prescription drugs gets abused the most?

A. Inhalants

B. Tranquilizers

C. Opioids/Painkillers

D. Stimulants

Time: 10 seconds

Summary – Lesson 2: Prescription Drug Diversion Defined

- Prescription drug diversion can be defined as any act or deviation that removes a prescription drug from its intended path from the manufacturer to the patient
- Different types of diversion include:
 - Physicians selling prescriptions to drug dealers or abusers.
 - Pharmacists who falsify records and subsequently sell drugs.
 - Employees who steal from inventory.
 - Doctor shopping.
 - Forged prescriptions.
 - Or individuals who commit armed robbery
- The biggest threat for diversion are opioids/painkillers

Time: 10 seconds

Narration: This concludes Lesson 2 - Prescription Drug Diversion Defined. Read over the summary items. Once you are finished, click Next to move on to Lesson 3 – Red Flags.



Time: 11 seconds

Narration: We'll identify common red flags about prescription drug diversion associated with retail pharmacies. Let's begin with a scenario and observe what's taking place there.

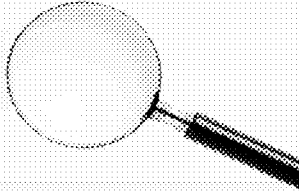
■ Observation Scenario

You're an AmerisourceBergen retail sales associate.

It's Thursday morning and you jump into your car, check your schedule, and head off to your first customer, Acme* Pharmacy.

Lately, you've had an uneasy feeling about the Acme Pharmacy. Over the past 2 months their pharmacy revenue has spiked more than expected.

As you arrive at the Acme Pharmacy, you notice...



*Acme Pharmacy is not a real pharmacy.

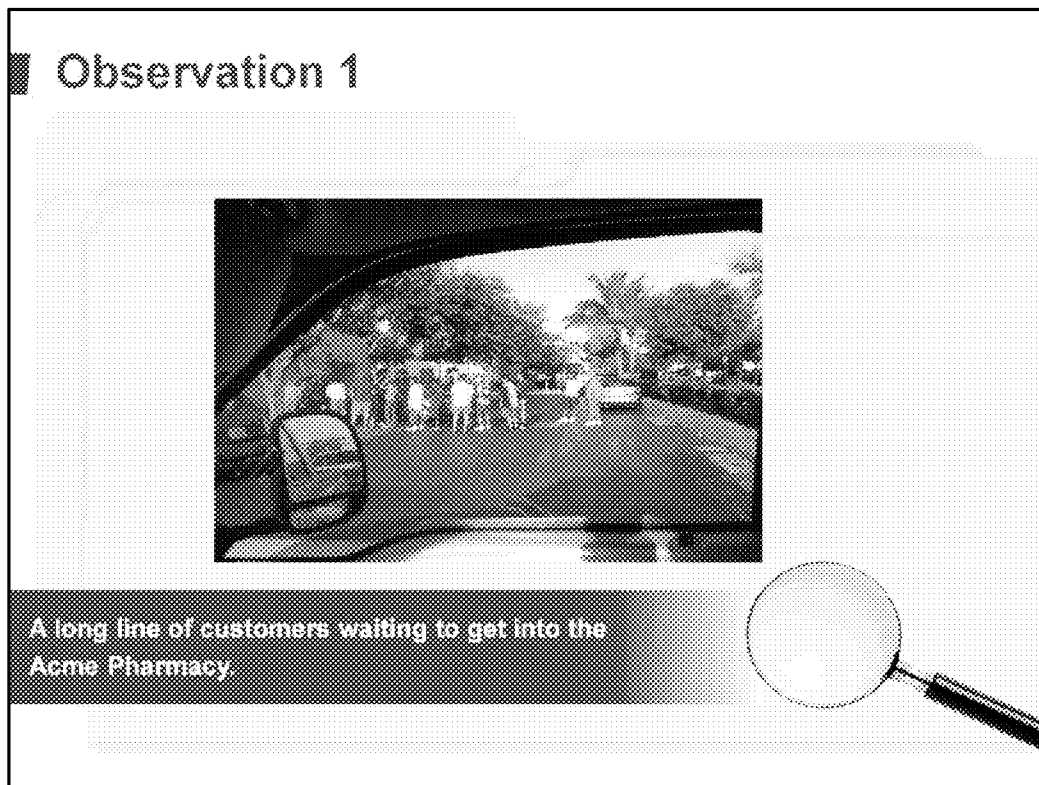
(Prod note: animate magnifying glass with text in. Combine this slide with #s35-38, text and magnifying glass appear with audio)

Time: 23 seconds

Narration: You're an AmerisourceBergen retail sales associate. It's Thursday morning and you jump into your car, check your schedule, and head off to your first customer, Acme* Pharmacy.

Lately, you've had an uneasy feeling about the Acme Pharmacy. Over the past 2 months their pharmacy revenue has spiked more than expected.

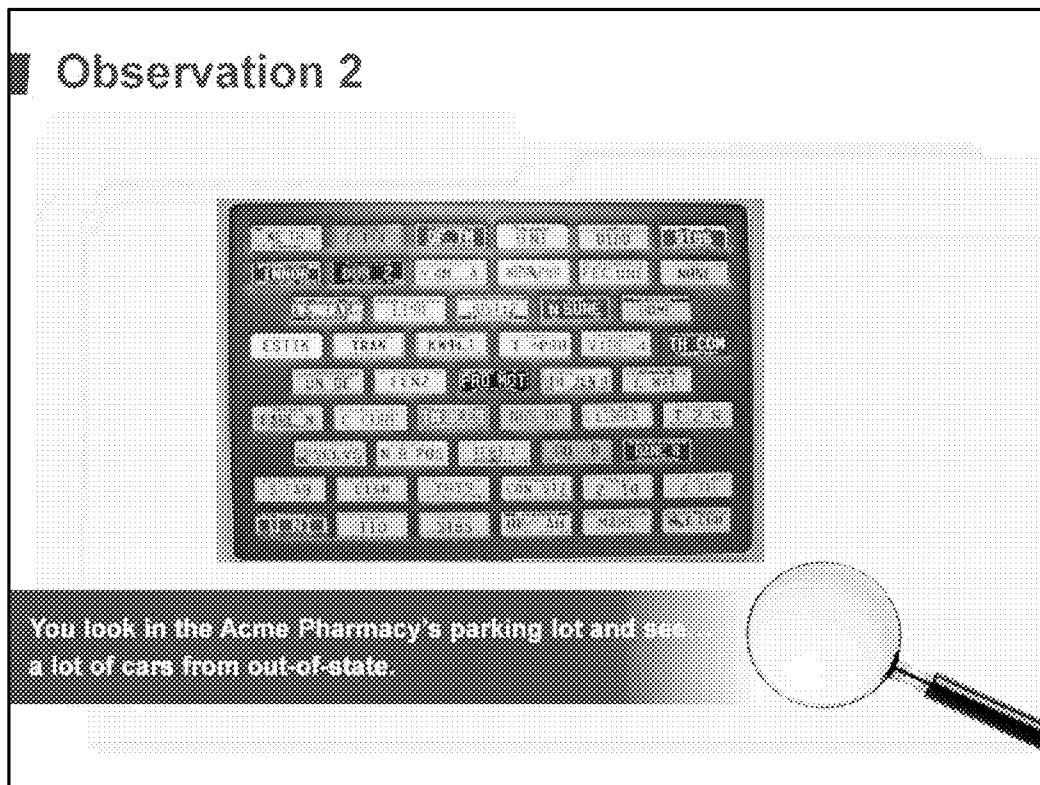
As you arrive at the Acme Pharmacy, you notice...



(Prod note: combine slides 34-38 with text and blue bar/magnifying glass / image animations 1 at a time, synched to audio.)

Time: 5 seconds

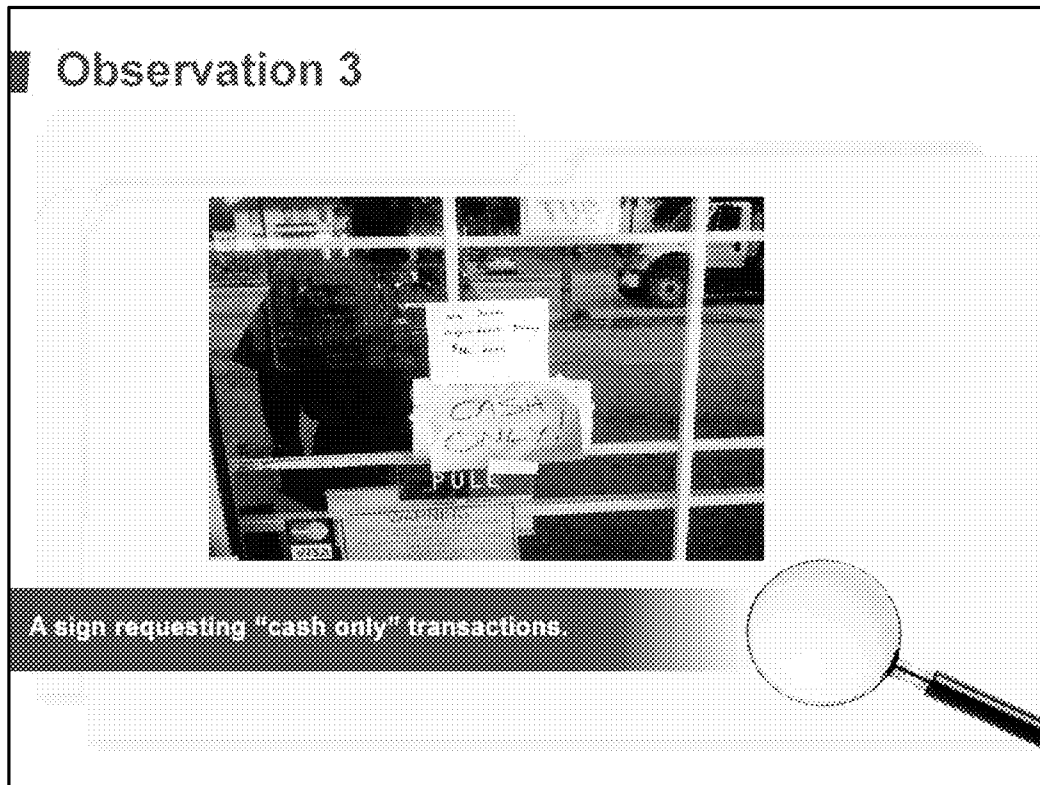
Narration: A long line of customers waiting to get into the Acme Pharmacy.



(Prod note: combine slides 34-38 with text and blue bar/magnifying glass / image animations 1 at a time, synched to audio.)

Time: 6 seconds

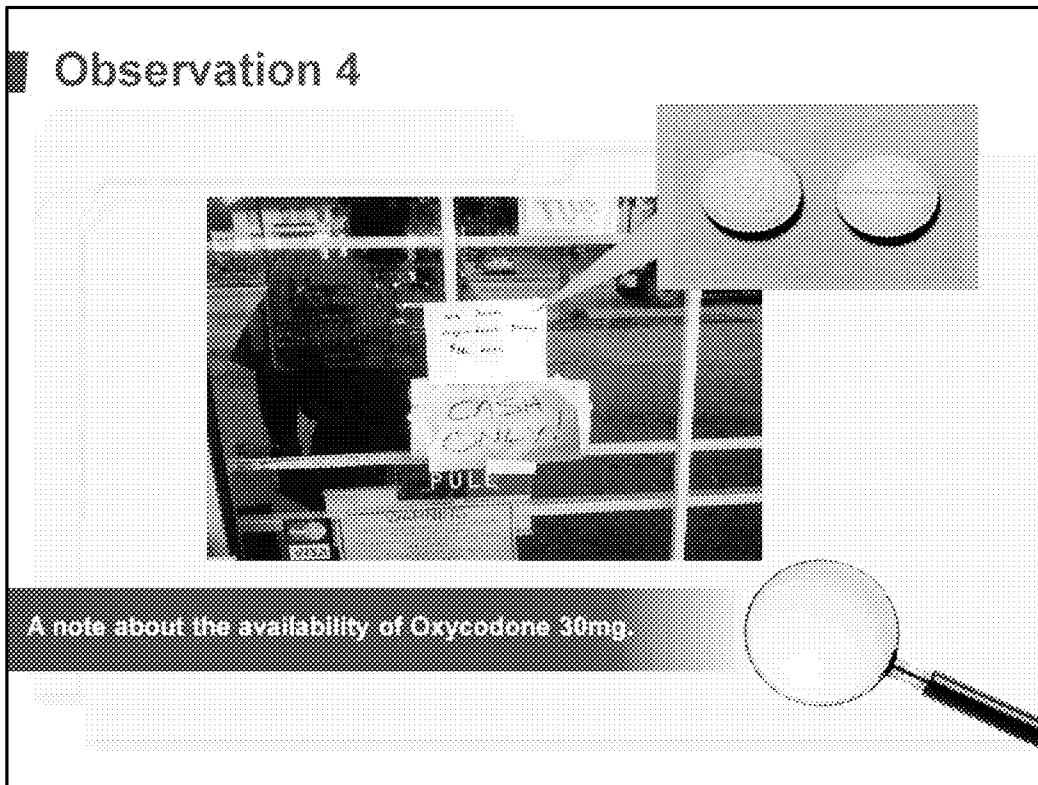
Narration: You look in the Acme Pharmacy's parking lot and see...a lot of cars from out-of-state.



(Prod note: combine slides 34-38 with text and blue bar/magnifying glass / image animations 1 at a time, synched to audio.)

Time: 4 seconds

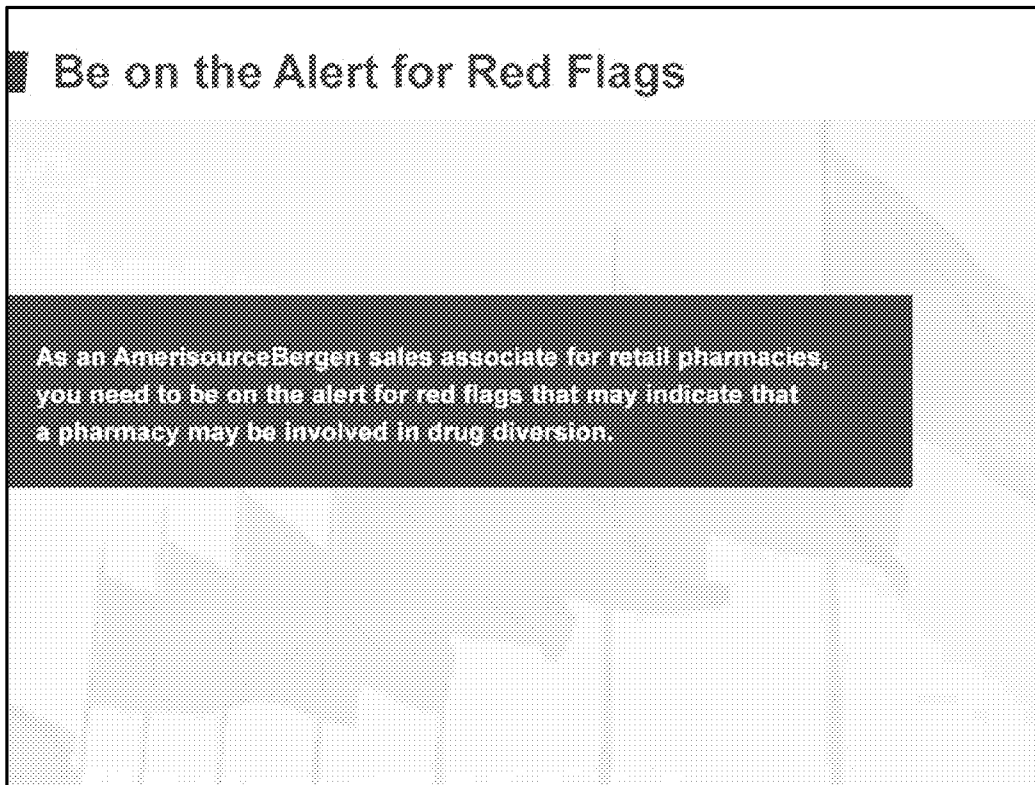
Narration: A sign requesting "cash only" transactions in the pharmacy window.



(Prod note: combine slides 34-38 with text and blue bar/magnifying glass / image animations 1 at a time, synched to audio.)

Time: 5 seconds

Narration: Along with a note about the availability of Oxycodone 30mg.



Time: 19 seconds

Narration: Some of those observations may be red flags. As an AmerisourceBergen sales associate for retail pharmacies, you need to be on the alert for red flags that may indicate that a pharmacy may be involved in drug diversion.

Let's see if you're familiar with some of the most common red flags associated with drug diversion.

True or False? Individuals or groups loitering inside and outside of a pharmacy are both red flags that should be reported to Corporate Security and Regulatory Affairs (CSRA), indicating that there is an increased chance of drug diversion taking place within a retail pharmacy.

A. True
B. False

Time: 10 seconds

True or False? Vehicles bearing out-of-state license plates in the pharmacy parking lot is a red flag that should be reported to Corporate Security and Regulatory Affairs (CSRA) indicating that there is an increased chance of drug diversion taking place within a retail pharmacy.

☐ A. True

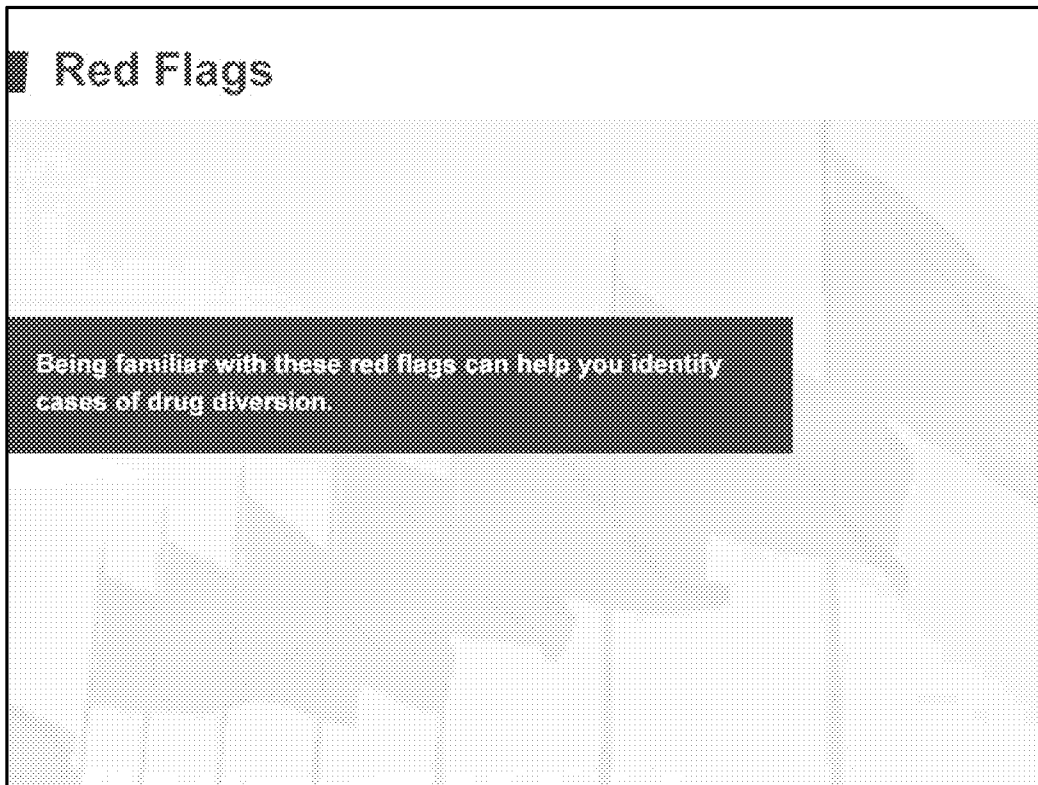
☐ B. False

Time: 10 seconds

True or False? Having a high number of prescription drug sales early Saturday mornings (e.g., 8:30am – 10:00am) is a red flag indicating that there is an increased chance of drug diversion taking place within a retail pharmacy.

A. True
B. False

Time: 10 seconds



(Prod Note: combine slides 44-48, sync audio blue bars, flags and images)

Time: 9 seconds

Narration: Being familiar with these red flags can help you identify cases of drug diversion. Let's look at these common red flags in a little more detail.

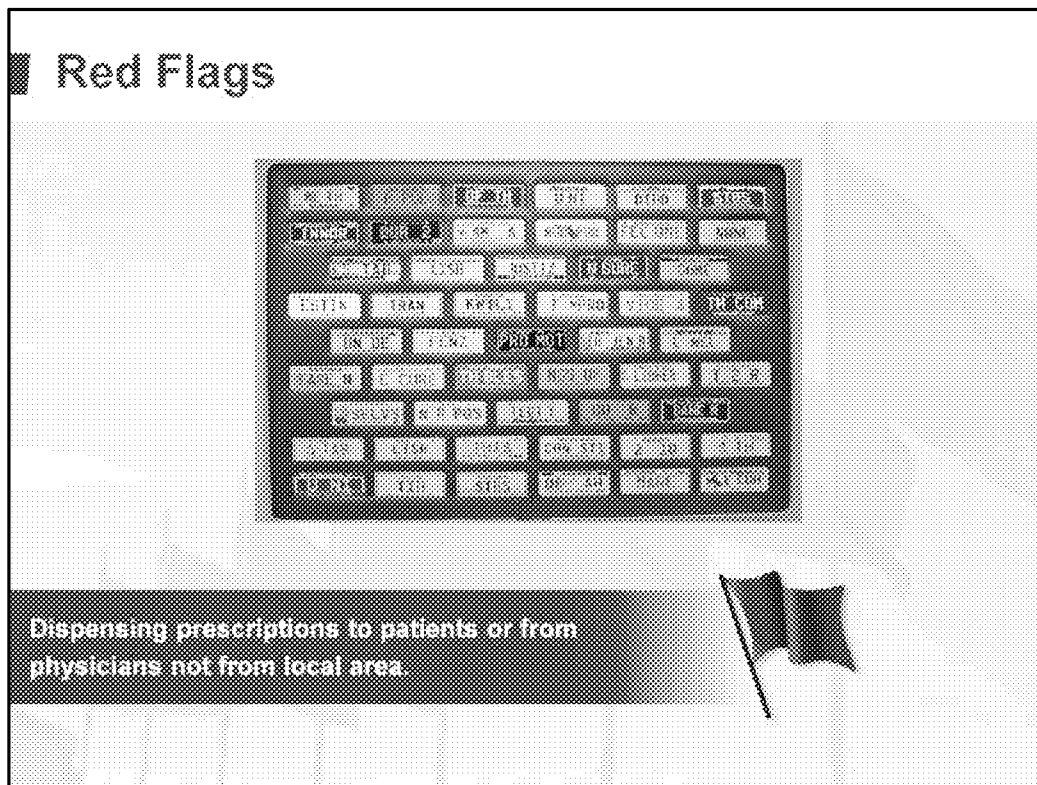


(Prod Note: combine slides 44-48, sync audio blue bars, flags and images)

Time: 34 seconds

Narration: Recall your first observation was long lines of patients standing outside the pharmacy. One of the criticisms that the Government has levied upon the industry is that if we had just visited certain problem pharmacies and observed the activities, that they would have been so far out of the norm, we would or should have known that something wrong was happening.

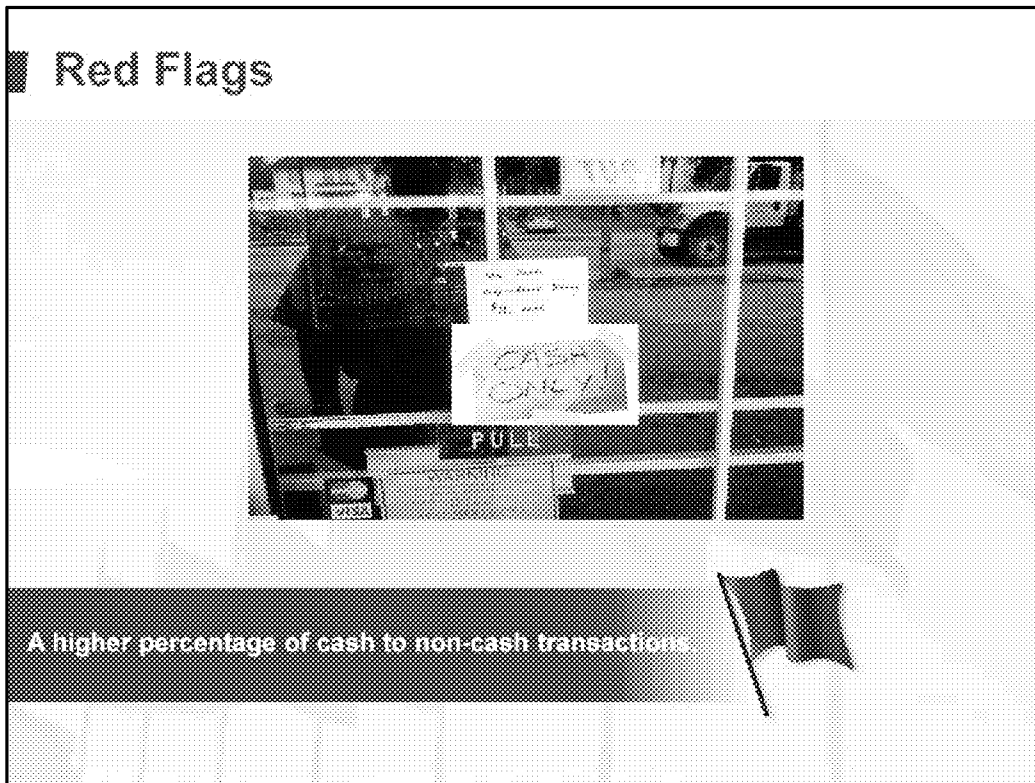
Generally speaking, you shouldn't see people loitering outside of the pharmacy, either standing or sitting in vehicles with multiple passengers. Problem pharmacies attract problem clients, because word spreads quickly.



(Prod Note: combine slides 44-48, sync audio blue bars, flags and images)

Time: 32 seconds

Narration: You noticed many vehicles from out of state in the pharmacy parking lot. One AmerisourceBergen associate described how he observed the activities at a particular pharmacy. He saw several vehicles from Tennessee, West Virginia, and Virginia show up at the pharmacy, typically with more than one person in the vehicle, where the occupants of the vehicle would go in, fill a prescription and then head right back to the highway in the direction of their home state. It is atypical behavior to travel out of state for prescriptions.



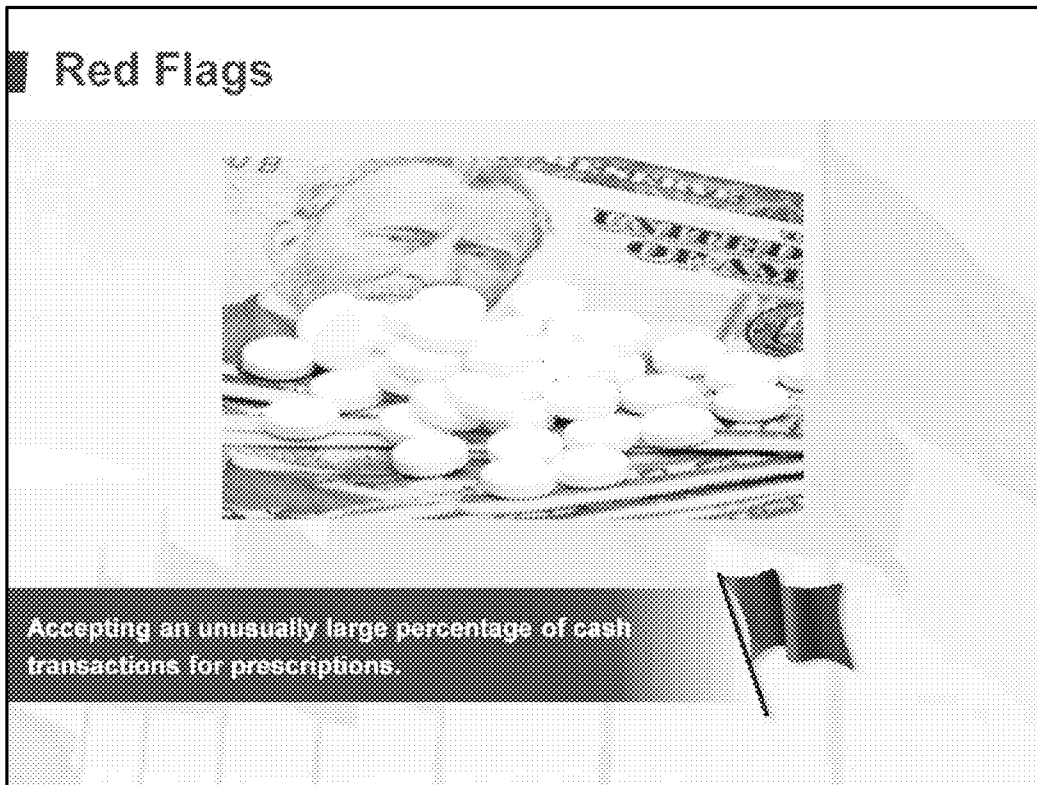
(Prod Note: combine slides 44-48, sync audio blue bars, flags and images)

Time: 55 seconds

Narration: Any sign or indication that the pharmacy is more interested in “selling” drugs, than “dispensing” drugs is a problem. In this example, the pharmacy is promoting the sale of Oxycodone 30 milligrams and cash transactions, both of which are red flags for possible diversion.

This is only one example. The problem of prescription drug diversion is dynamic. As a sales associate, you are face-to-face with the customer and you know best what a normal pharmacy operation looks like and are capable of identifying irregularities; it’s just a matter of identifying red flags as a part of your normal interaction and visit with the customer.

If you observe anything that you suspect may be related to drug diversion, even if you’re not sure, contact a member of the Diversion Control Team (DCT) at Corporate Security and Regulatory Affairs (CSRA’s) to relay that information. You can the following email address: “CSRAOMP@amerisourcebergen.com.” They will conduct the appropriate follow-up.



(Prod Note: combine slides 44-48, sync audio blue bars, flags and images)

Time: 10 seconds

Narration: Look around at the clientele. Do they resemble the clientele you would expect to meet at your local pharmacy? Are you noticing multiple cash transactions while you are there?



(Prod Note: combine slides 44-48, sync audio blue bars, flags and images)

Time: 42 seconds

Narration: Ask yourself the following questions while interacting with your customers. Are the doors and windows barred? Is there an armed guard? Is the pharmacy selling health and beauty aids, or are they just dispensing a specified volume of prescriptions? There may be reasonable explanations for any or all of these situations, but your role and obligation is to recognize the irregular activity and to report it to CSRA.

Our objective is to arm you with enough information so that you can carry out your job while still being the eyes and ears of the company's drug diversion control program. This should be a seamless process and if designed correctly, should not detract from your job.

■ Summary – Lesson 3: Red Flags

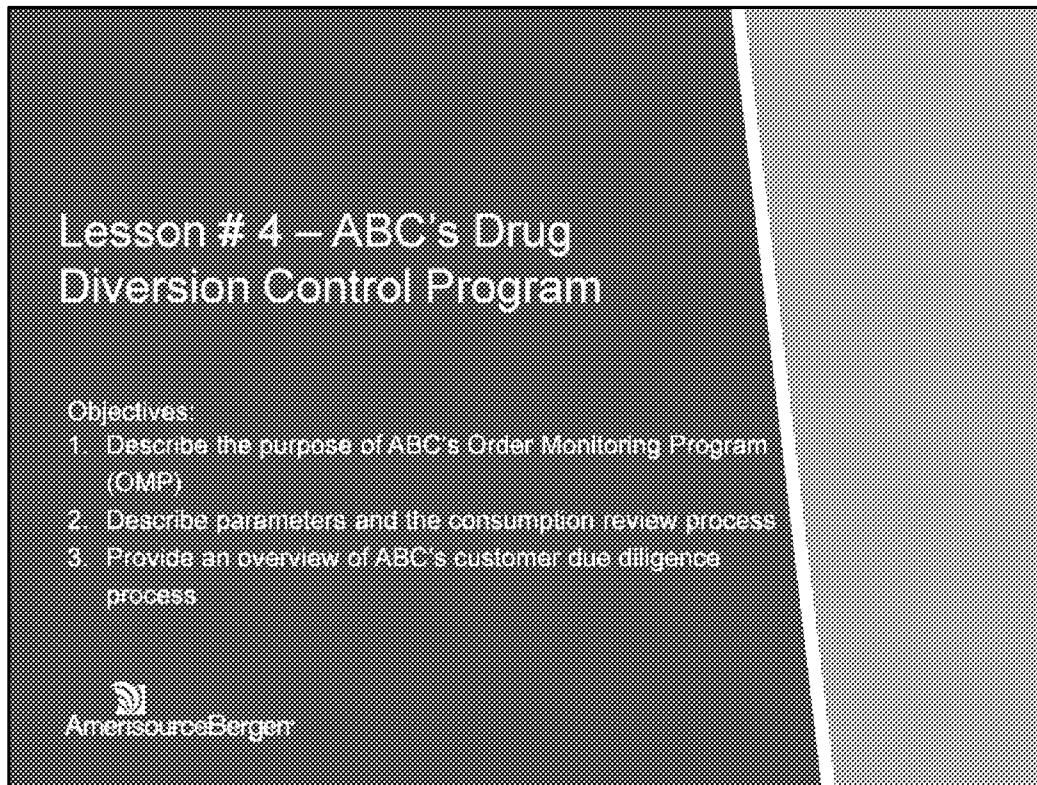
Red flags include:

- Long lines of patients standing outside a pharmacy waiting to fill controlled substance prescriptions
- Dispensing prescriptions to patients or from physicians not from local area
- Not selling health and beauty aids and only dispensing drugs
- Dispensing a high percentage of Oxycodone 30 mg prescriptions versus all other Oxycodone strengths being dispensed
- A high percentage of cash transactions
- Barred windows & doors
- An armed guard

Time: 11 seconds

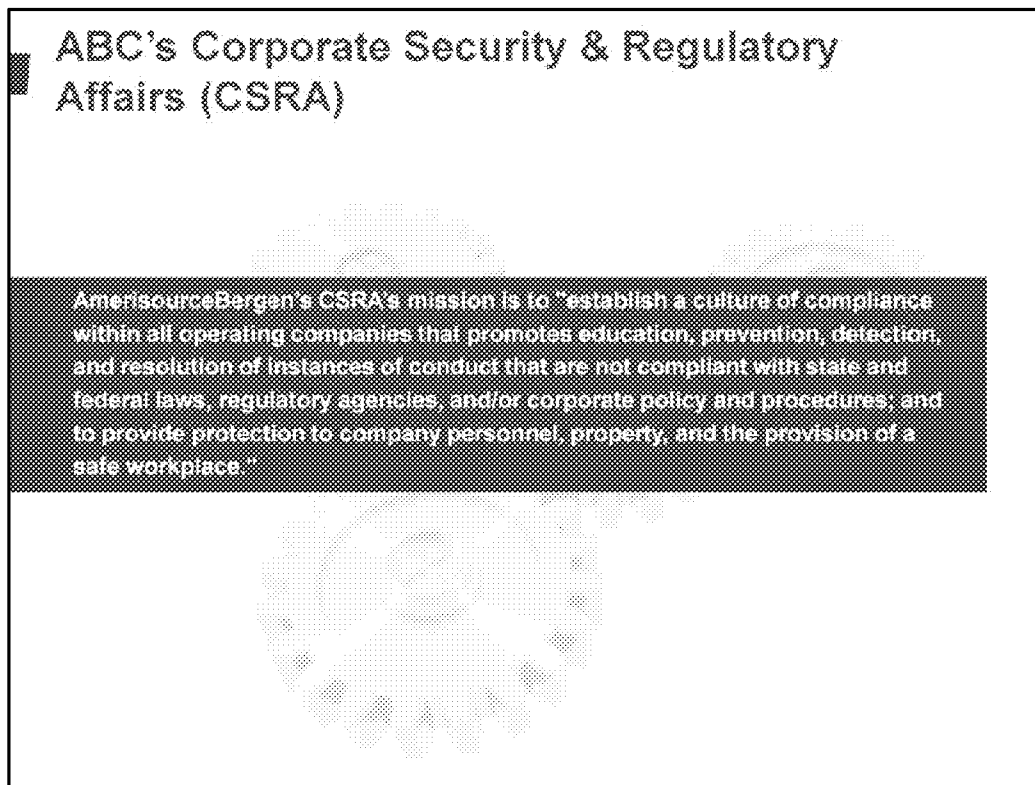
***Total time: Slides 1-49:** 15 minutes, 32 seconds

Narration: This concludes Lesson 3: Red Flags. Read over the summary items. Once you are finished, we will move on to Lesson 4 – ABC's Drug Diversion Control Program.



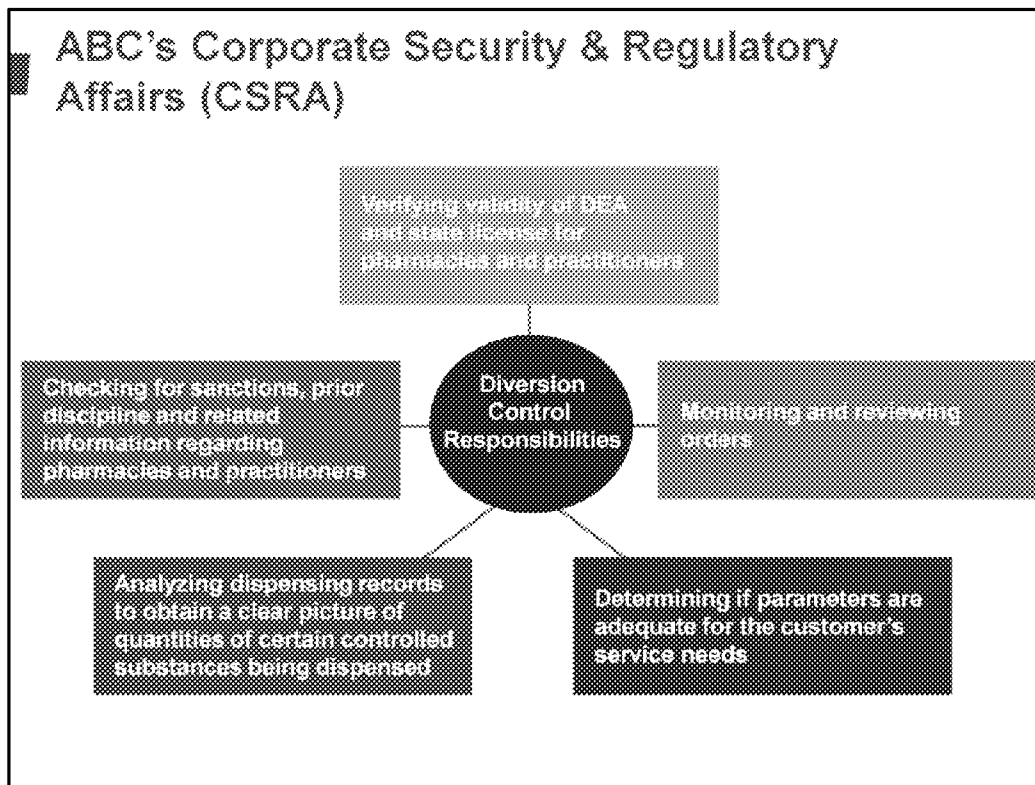
Time: 19 seconds

Narration: In understanding AmerisourceBergen's Drug Diversion Control Program, we'll learn about the Order Monitoring Program we have in place to identify and report suspicious orders to the government. We'll then discuss the importance and impact of parameters for our customers. We'll then explore our customer due diligence process.



Time: 17 seconds

Narration: To understand the Order Monitoring Program, let's talk about our compliance group, Corporate Security and Regulatory Affairs or CSRA. Their mission is to establish a culture of compliance within all operating companies at AmerisourceBergen. Although CSRA is responsible for managing drug diversion control for the company, sales associates are the eyes and ears in the field.



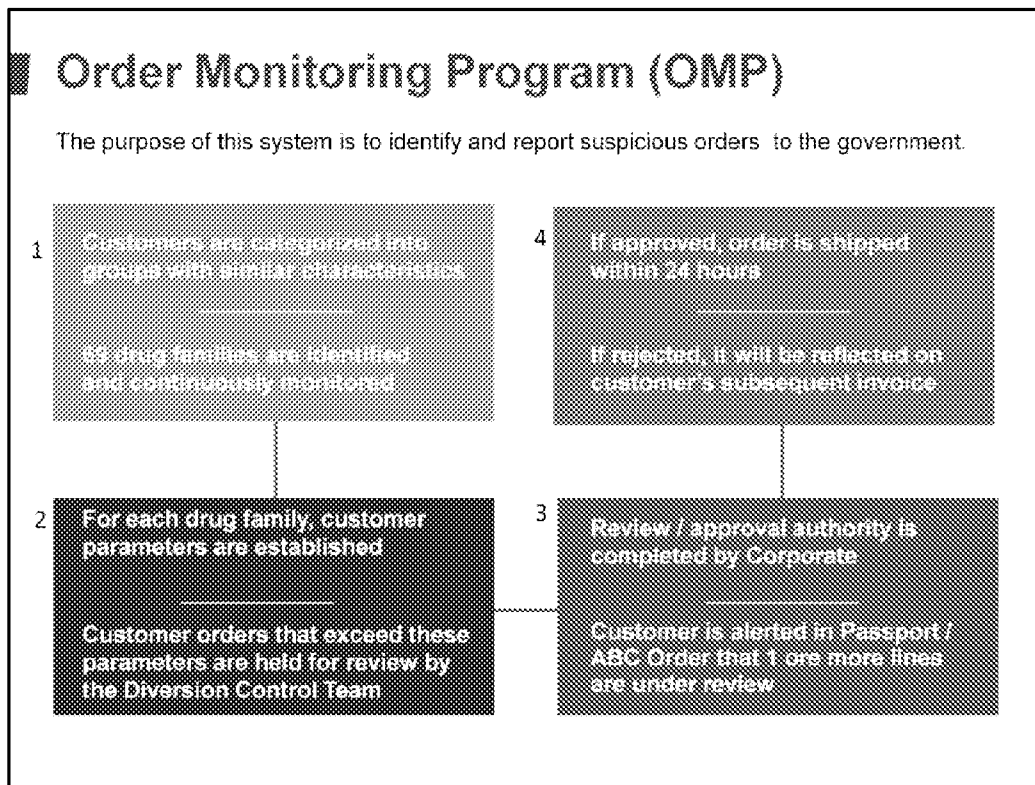
(Prod note: have circle in the center with Diversion Control Responsibilities animate in and then different points/boxes animate in 1 at a time)

Time: 33 seconds

Narration: CSRA's drug diversion control responsibilities include:

- Verifying the validity of DEA and state license for pharmacies and practitioners
- Checking for sanctions, prior discipline, and related information regarding pharmacies and practitioners
- Analyzing dispensing records to obtain a clear picture of quantities of certain controlled substances being dispensed
- Determine if program parameters are adequate for customers to meet the legitimate medical needs of their patients
- Monitoring and reviewing orders

Let's discuss the Order Monitoring Program.



(Prod note: box 1 animates and then box 2 animates in after, followed by boxes 3 and 4)

Time: 1 minute, 13 seconds

Narration: The order monitoring program, or OMP, is one of the most important components to the diversion control program. The purpose of this system is to identify and report suspicious orders to the government, as required by law.

Within the program, customers are categorized into groups with similar characteristics. 69 different drug families have been identified and are continuously monitored within the program. We establish parameters within the program for each of those drug families. If an order exceeds those parameters, it is flagged for further review. During this process, the customer will first receive a message in **Passport / ABC Order** informing them that one or more lines of an order are under review. Once an order is reviewed, it will either be shipped or rejected. This decision is made within a 24 hour window. Whether the order has been shipped or rejected will be reflected on the customer's subsequent invoice.

What if a customer wants to order more?

[illegible]

(Prod note: fade in consumption review request form with 2nd paragraph).
(Fade in box 2 with paragraph 3). (Fade in email address with email in 3rd paragraph.

Time: 1 minute, 36 seconds

Narration: Our customers do not have the ability to order unlimited quantities of controlled substances within the current OMP. We recognize, however, that unusual circumstances may arise that require us to adjust program parameters for one or more drug families for a particular customer. The consumption review process is developed to ensure that the customer has the necessary inventory of controlled substances to meet the legitimate medical needs of their patients.

When a consumption review is required, the consumption review form can be found on the Hub. The form must be completed accurately by the pharmacy owner and/or pharmacist in charge (PIC). The form should specifically address the drug family under review and the circumstances that have led to the increased demand for the drug. Once complete, this form should then be returned via email.

Having consistently been denied additional quantities is not justification to adjust parameters. When the Diversion Control Team reviews the justification, they are

going to ask themselves, would I be comfortable presenting this information to a government regulator three years from now? That question, among others, will help determine justification for the decision that was made.

We expect that these situations or conditions will be truly unique. Making an adjustment to a parameter is the exception rather than the rule. In terms of your communication with the customer, they should know that this process exists and that the pharmacy owner or pharmacist in charge can assist by completing the consumption review form. This decision is made solely by the Diversion Control team after reviewing all of the available data.

New Customer Due Diligence — Form 590

Know Your Customer

Onboarding Form 590

Evaluates potential risk of customer

Legible, complete and accurate

Completed and signed by customer and sales associate

Interior/exterior photos of pharmacy

The Diversion Control Team will approve or disapprove the sale

The Diversion Control Team will send a letter to the customer if disapproved

Form 590 on the Hub

(Prod Note: Fade in form 590 hyperlink with 3rd sentence of 1st paragraph. Fade box 2 in with 3rd paragraph)

Link:

<https://c.na79.visual.force.com/apex/CommunityContentNavigator?documentid=06914000005iMOqAAM>)

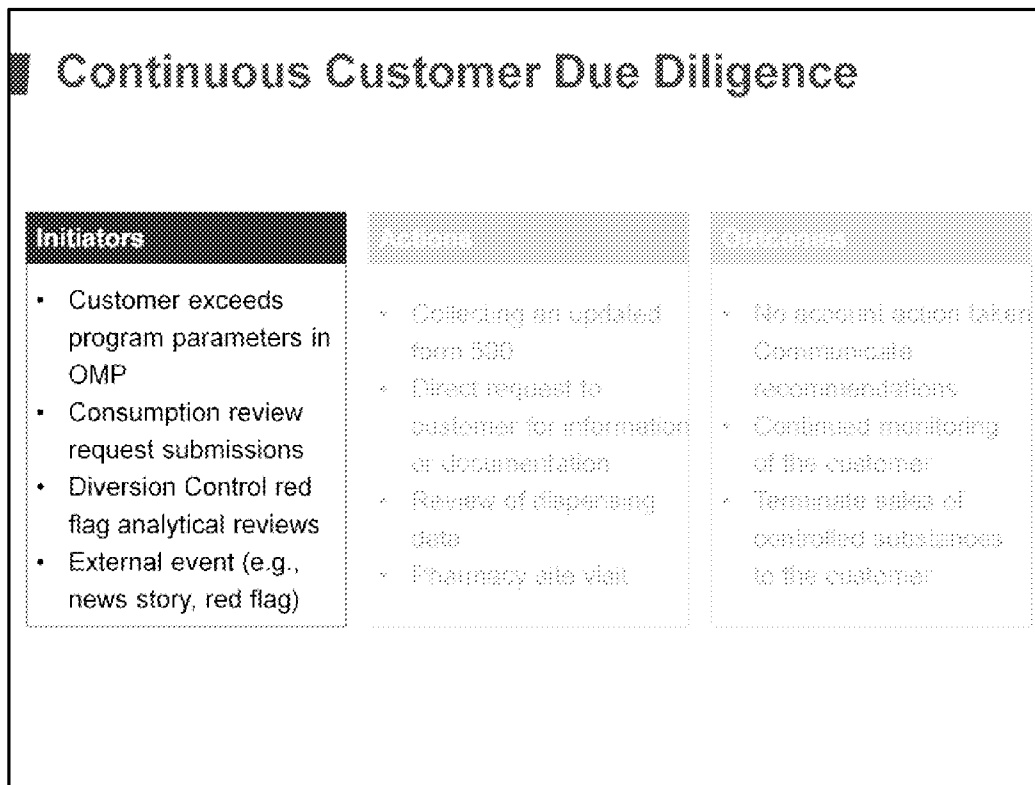
Time: 1 minute, 5 seconds

Narration: Another key component of the Diversion Control program is the Know Your Customer (KYC) due diligence standard. You play an important role in meeting this standard by facilitating the completion of the Form 590 customer questionnaire during the onboarding process. This questionnaire gathers information that enables the Diversion Control Team to evaluate the customer in terms of potential risk.

Required information on the form must be legible, complete and accurate. If information is lacking or incomplete, then an informed decision cannot be made. In such cases, the form is not accepted which will delay the onboarding process. The Diversion Control Team requires a completed and signed Form 590 with supporting exterior and interior photos of the pharmacy building.

Once the Diversion Control Team has all of the required information, they will

make a decision within five business days to approve or disapprove the customer for the sale of controlled substances. If disapproved, the customer will receive a letter from the Diversion Control Team informing them of the reasons and their opportunity to request reconsideration with a copy of this letter provided to sales senior managers.

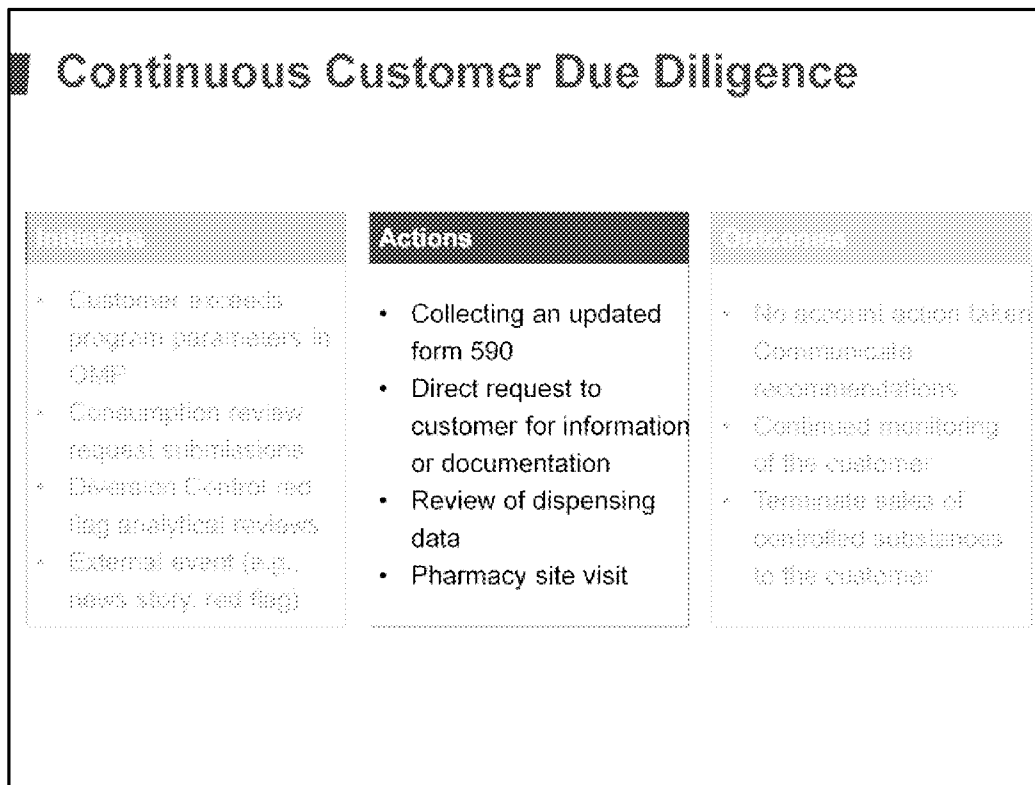


(Prod note: combine this slide with slides 57 and 58. Have 3 boxes up at once)

Time: 51 seconds

Narration: The due diligence process doesn't end after the customer is approved by Diversion Control Team during onboarding. It is an ongoing process that can be initiated by numerous activities. For example, if a customer is frequently exceeding program parameters in OMP or when a consumption review request is submitted, both would initiate a comprehensive customer review. The Diversion Control Team also produces and analyzes its own unique reports on a monthly basis to identify potential indicators of drug diversion among the customer database. We look closely at the high risk drugs and do percentage comparisons that may lead us to take a closer look at a particular customer.

Finally, there could be an external event that initiates a customer review, such as learning through a sales associate or news story that there's been a government enforcement action at one of our customer locations.



(Prod note: combine this slide with slides 56 and 58. Have 3 boxes up at once, put faded boxes over initiators and outcomes)

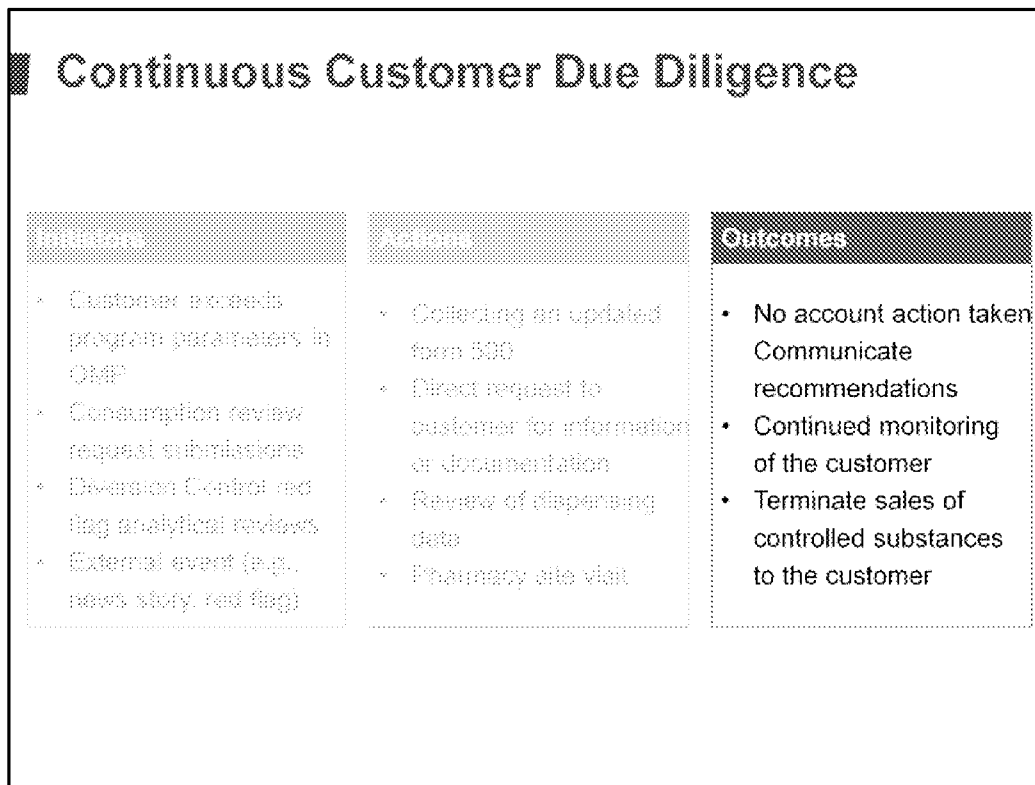
Time: 41 seconds

Narration: There are numerous actions involved with ongoing customer due diligence. Some customers may be asked to submit an updated form 590 customer questionnaire. It may be a comprehensive review of consumption data during an extended period of time.

We may ask the customer for a list of their five top prescribers so that we may perform additional background checks for adverse actions.

We may visit the pharmacy to discuss dispensing patterns and evaluate the pharmacist in charge's ability to carry out their responsibility when it comes to evaluating the legitimacy of the prescription.

(Prod note: combine this slide with slides 56 and 58)



(Prod note: combine this slide with slides 56 and 57. Have 3 boxes up at once, put faded boxes over initiators and actions)

Time: 31 seconds

Narration: There are numerous outcomes resulting from ongoing customer due diligence. Sometimes, no account action is taken and the account will continue to be serviced. In some cases, we may communicate recommendation to the customer in an effort to train and educate them about drug diversion.

We may decide to modify the customer's ability to order specific controls when monitoring current ordering patterns present a greater risk.

Finally, when we encounter a situation where we perceive moderate to substantial risk of drug diversion, we may terminate sales of controls to the customer.

(Prod note: combine this slide with slides 56 and 57)

■ Outcomes of Terminated Sales

Termination of Sales

- Both sales and customer notified in writing
- Customer afforded opportunity to request reconsideration of decision
- Immediate actions would only result from signification indications of drug diversion
- Designated sales managers provided with 24 hours advanced notice of proposed action
 - Opportunity to inform impacted associates
- Timely communication with sales and our customers is critical
- Do not advocate in any manner for the customer at this time
- Final decisions to be made by CSRA in consultation with Legal

Time: 54 seconds

Narration: If sales were terminated, either immediately or during a specified time period, both sales and the customer would be notified in writing. The customer would be afforded the opportunity to request reconsideration of the decision.

Immediate actions are rare and would only result when there are significant indications of drug diversion.

Designated sales managers would be provided with 24 hour advance notice of the proposed action so that they had the opportunity to inform the impacted associates.

Timely communication with sales and our customers is critical. In terms of customer interaction at this phase, we ask that you do not put yourself in the position to advocate in any manner for the customer. These decisions must be made independently by CSRA in consultation with Legal and will be final.

☐ True or False? A CSRA Form 590 (Retail Pharmacy Questionnaire) must be completed for all prospective retail customers.

A. True

B. False

Time: 10 seconds

What system does ABC use to identify suspicious orders related to drug diversion?

A. OMP (Order Monitoring Program)

B. System 354

C. ARCOS (Automation of Reports & Consolidated Orders System)

D. Nothing. Sales associates are required to monitor their customer's orders and report any suspicious orders to CSRA (Corporate Security & Regulatory Affairs).

Time: 10 seconds

☐ True or False? Once a retail customer has been approved by CSRA to sell controlled substances, they are permitted to order any amount of drugs.

A. True

B. False

Time: 10 seconds

In the context of prescription drug diversion, what is the purpose of a consumption review?

- A. To help a pharmacy determine the proper amount of drugs to order so as not to have too much invested in excess inventory
- B. To ensure that the customer has the necessary inventory of controlled substances to meet the legitimate medical needs of their patients
- C. To determine the maximum annual prescription insurance coverage for pharmacy patients to help forecast revenues
- D. To help set initial drug family order parameters for new customers

Time: 10 seconds

☐ What ongoing activities does ABC do to ensure customers are not diverting drugs? Select all that apply.

☐ A. OMP monitors for any suspicious orders

☐ B. CSRA analyses ordering reports on a regular basis

☐ C. Reviews are regularly scheduled with every pharmacy customer to monitor current parameters

☐ D. Various ABC personnel monitor news reports and government filings related to pharmacies that may involve drug diversion

Time: 10 seconds

Summary – Lesson 4: ABC's Drug Diversion Control Program

- For all retail customers, Form 590 is required
- The OMP, or order monitoring program, groups customers by similar characteristics to look for irregular orders and sets parameters for drug families
- Consumption reviews are used to ensure customers have the necessary inventory to meet legitimate medical needs of patients
- Customers are continually reviewed as part of the customer due diligence process
- Depending on what is observed in the customer due diligence process, service could be continued as normal, modified, or stopped altogether

Time: 9 seconds

***Total time: Slides 1-65:** 23 minutes, 42 seconds

Narration: This concludes Lesson 4 - ABC's Drug Diversion Control Program. Read over the summary items. Once you're finished, we'll move on to the Wrap-up section.



Time: 9 seconds

Narration: In this final section, we will wrap up this eLearning course. We'll also cover additional resources and expectations to make an impact.

Why are We Concerned about Prescription Drug Diversion?

It's the law!

 U.S. DEPARTMENT OF JUSTICE ★ DRUG ENFORCEMENT ADMINISTRATION
DIVERSION CONTROL DIVISION
Title 21 – CSA Code of Federal Regulations

21 CFR 1301.71(a)
"All applicants and registrants shall provide **effective controls and procedures** to guard against theft and diversion of controlled substances."

21 CFR 1301.74
Requires that registrants design and operate a **system to identify suspicious orders** and report suspicious orders to DEA when discovered.

Time: 28 seconds

Narration:

So, why are we so concerned about prescription drug diversion? Well, the short answer is "it's the law!!" Recall the DEA's Title 21 Controlled Substance Act. AmerisourceBergen is a DEA registrant, and by law, must have controls and procedures in place to guard against theft and diversion of controlled substances, in addition to having systems in place to identify and report suspicious orders.

(Prod note: animate "It's the law!" in with audio)

(Prod note: animate “It’s the right thing to do!” in with audio)

■ Additional Resources – Websites



U.S. DEPARTMENT OF JUSTICE • DEPARTMENT OF JUSTICE
DIVERSION CONTROL DIVISION

<https://www.deaiversion.usdoj.gov/>



Centers for Disease Control and Prevention
CDC 24/7: Saving Lives. Protecting People™

<https://www.cdc.gov/>



<https://www.cdc.gov/vitalsigns/index.html>

Time: 12 seconds

Narration: To learn more about drug diversion and prescription drug abuse, visit the U.S. Department of Justice's DEA Diversion Control Division, the CDC, and Vital Signs websites.

■ “Red Flags” Video for Pharmacists

The “Red Flags” video uses real-life scenarios to educate pharmacists on how to identify the warning signs of prescription drug abuse and drug diversion when dispensing controlled substance prescriptions.

Recommended Action Items:

- Watch the video
- Provide the web address link to your pharmacy customers

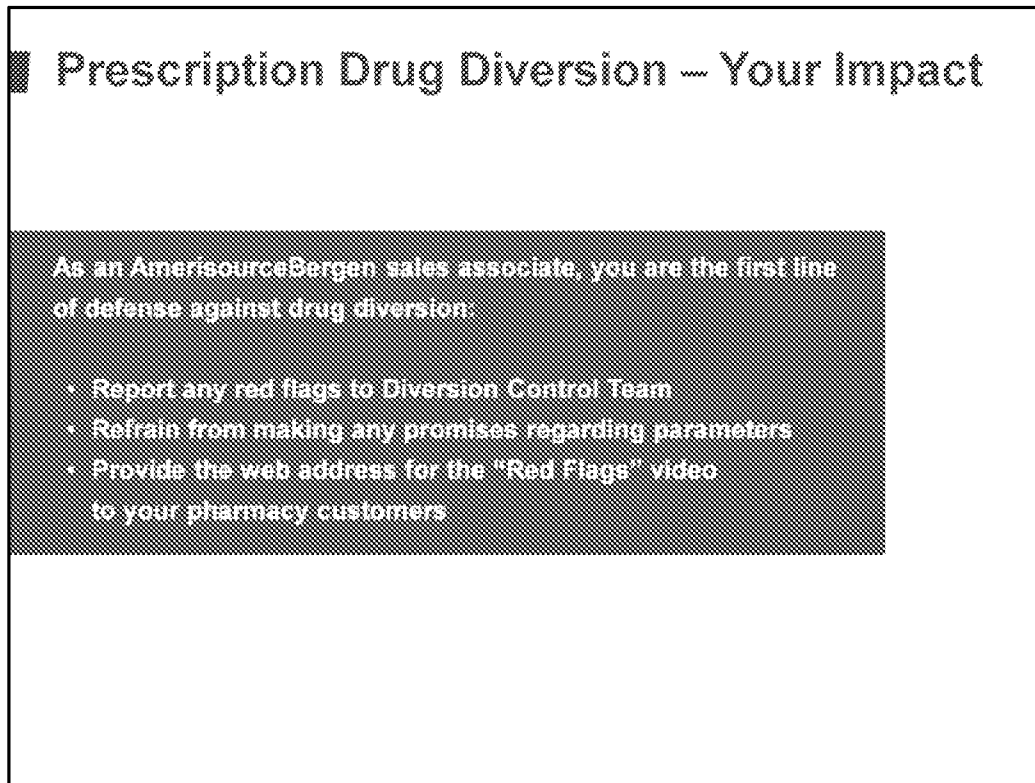


<https://nabp.pharmacy/initiatives/awarex/pharmacist-resources/>

Time: 48 seconds

Narration: The national association of boards of pharmacy, NABP, and the Anti-Diversion Industry Working Group, a consortium of pharmaceutical manufacturers and distributors including ABC, created “Red Flags” to educate pharmacists on how to identify the warning signs of prescription drug abuse and drug diversion when dispensing controlled substance prescriptions. It’s recommended that you view this video and become familiar with the red flags from the perspective of a pharmacist. It’s also recommended that you provide this link to your pharmacy customers, so they are aware of these red flags.

To view the video, click the web address link. Copy this link from the browser to provide it to your pharmacy customers.



Time: 24 seconds

Narration: As an AmerisourceBergen sales associate, you are the first line of defense against drug diversion.

Report any red flags to Diversion Control Team. Refrain from making any promises regarding parameters. Provide the web address for the “Red Flags” video to your pharmacy customers. You play a part to help us prevent prescription drug diversion.

(Prod note: this text is animated / synched to audio)



Time: 12 seconds

Narration: For a deeper understanding of drug diversion or if you have any questions that were not addressed by this training, feel free to contact AmerisourceBergen's experts for more information.

Time: 14 seconds

***Total time: Slides 1-73:** 26 minutes, 34 seconds

Narration: Once you view all of the slides and exit this course, be sure to complete the assessment in the Learning Portal. You will need a passing score of 80% to earn a completion status. Congratulations! You have finished the course portion of this training. It is now time to take the assessment.